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Attorneys for OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SAN FERNANDO VALLEY DIVISION

In re:

ICPW Liquidation Corporation, a California  
corporation<sup>1</sup>,

Debtor and Debtor in Possession.

In re:

ICPW Liquidation Corporation, a Nevada  
corporation<sup>2</sup>,

Debtor and Debtor in Possession.

- ☐ Affects both Debtors
- ☒ Affects ICPW Liquidation Corporation, a  
California corporation only
- ☐ Affects ICPW Liquidation Corporation, a  
Nevada corporation only

Lead Case No.: 1:17-bk-12408-MB

Jointly administered with: 1:17-bk-12409-MB

Chapter 11 Cases

**FIRST INTERIM APPLICATION FOR  
ALLOWANCE OF FEES AND COSTS  
FILED BY BROWN RUDNICK LLP  
[SEPTEMBER 22, 2017 TO NOVEMBER 9,  
2017]; DECLARATION OF CATHRINE M.  
CASTALDI**

DATE: December 12, 2017

TIME: 1:30 p.m.

CTRM: 303

21041 Burbank Blvd.  
Woodland Hills, CA 91367

<sup>1</sup> Formerly known as Ironclad Performance Wear Corporation, a California corporation.

<sup>2</sup> Formerly known as Ironclad Performance Wear Corporation, a Nevada corporation.

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1 TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY JUDGE,  
2 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

3 Brown Rudnick LLP ("Brown Rudnick"), counsel to the Official Committee of Unsecured  
4 Creditors (the "Committee") in the ICPW, hereby submits this Application seeking payment for:  
5 (i) Brown Rudnick's attorneys' fees in the amount of \$174,319.50, and (ii) reimbursement of  
6 expenses in the amount of \$3,526.84, for the period of September 22, 2017 through November 9,  
7 2017 (the "Application Period"), as set forth more particularly herein. In support of this  
8 Application, Brown Rudnick respectfully states as follows:

9 1. PAYMENT AND REIMBURSEMENT REQUESTED

10 Brown Rudnick submits this Application (a) for payment of reasonable compensation for  
11 actual, reasonable, and necessary professional services performed by it as counsel for the  
12 Committee during the Application Period, and (b) for reimbursement of actual, reasonable, and  
13 necessary disbursements made to pay expenses incurred in representing the Committee during the  
14 Application Period. This Application is made pursuant to applicable provisions of the Bankruptcy  
15 Code and Bankruptcy Rules as well as applicable local, Court and United States Trustee rules and  
16 guidelines. This is Brown Rudnick's first interim fee application.

17 During the Application Period, the Committee incurred fees of \$174,319.50 for legal  
18 services rendered by Brown Rudnick, calculated at Brown Rudnick's usual and customary hourly  
19 rates as more specifically set forth herein comprising 313.70 hours of professional time  
20 representing a blended hourly rate of \$555.69. In addition, Brown Rudnick made disbursements  
21 to pay expenses in the amount of \$3,526.84 during the Application Period. All of the fees and  
22 disbursements sought to be paid or reimbursed in connection with this Application were actual,  
23 necessary, and reasonable, and benefited the Debtors' estates and creditors.

24 2. DESCRIPTION OF REASONABLE AND NECESSARY SERVICES RENDERED

25 The following provides a summary of the services rendered by Brown Rudnick during the  
26 Application Period. A full description of services performed during the Application Period is  
27 reflected in the time records annexed hereto as Exhibit "2."

28 ///

1 A. Case Administration

2 During the Application Period, Brown Rudnick spent 32.40 hours performing services  
3 related to Case Administration, and charged fees for these services in the amount of \$18,279.00.  
4 The services provided by Brown Rudnick in this category include an analysis of pleadings,  
5 schedules and statements filed in advance of the Committee's appointment, and create master  
6 pleading for Committee filings, conferences regarding case strategy, set up and implementation of  
7 Committee protocols and practices, conferences with the Office of the United States Trustee and  
8 counsel for the Official Committee of Equity Security Holders (the "Equity Committee") to  
9 coordinate efforts so as to minimize duplication of effort, and drafting a Non-Disclosure  
10 Agreement to enable the Committee to have access to sale information.

11 B. Asset Analysis, Recovery and Disposition

12 During the Reporting Period, Applicant spent approximately 10.80 hours performing  
13 services in connection with asset analysis, recovery and disposition. Applicant's fees charged for  
14 services related to asset analysis and recovery are \$5,958.00, which represents 3.4% of the total  
15 fees sought by this Application. The blended hourly rate for services performed in this regard is  
16 approximately \$551.67 per hour. The Committee was appointed in the midst of a rapidly  
17 developing sale process, which required the Committee to immediately dive in to issues  
18 surrounding the Debtors' arrangement with Radians Warehouse Holdings ("Radians") to be the  
19 stalking horse bidder in a sale of substantially all of the Debtors' assets, excluding certain  
20 litigation claims against third parties, and the Debtors' officers and directors. Radians negotiation  
21 of the sale process and acquisition of the Debtor's property were further complicated by Radians'  
22 pre-petition acquisition of Capital One's first lien position with respect to the Debtors' assets.  
23 From all objective reports, it was clear that Radians had negotiated the asset purchase agreement  
24 from a position of substantial leverage over the Debtors.

25 In short order, the Committee was able to provide a substantive counterpoint to some of  
26 the more onerous provisions of the proposed bid procedures, as well as build certain protections  
27 into the asset purchase agreement, which the Debtors were not in a position to negotiate for the  
28 Estates. The Committee believes that its efforts in connection with negotiating these additional

1 provisions with respect to the bid procedures and the asset purchase agreement ensured a fair and  
2 successful sale process. Applicant's efforts included filing limited objections to the bid  
3 procedures motion, negotiating with interested stakeholders including the Debtors, Radians, the  
4 Equity Committee and the Office of the United States Trustee, as well as attendance and  
5 participation in hearings related to the bid procedures and the auction, and evaluating and  
6 proposing changes, in some instances, with respect to the sale documents and orders concerning  
7 the sale. Throughout the course of these proceedings, Committee counsel worked with counsel for  
8 the Equity Committee in an effort to eliminate duplication of effort where possible. In addition,  
9 counsel for the Committee relied on the Committee's financial advisor to evaluate the business  
10 aspects of the sale process, undertake most communications with the Debtors financial advisor, as  
11 well as to assist in evaluating the Debtors' evolving claims picture. Brown Rudnick believes that  
12 its efforts in these regards were skillful and creative and resulted in an overall better sales process,  
13 which resulted in a substantial recovery for these Estates.

14 C. Financing/Cash Collections

15 During the Reporting Period, Applicant evaluated the Debtor's proposed use of cash  
16 collateral and the Debtors' post-petition financing arrangement with Radians. Applicant prepare a  
17 limited opposition to the Debtor-in-Possession's financing motion, while at the same time  
18 negotiating with Radians, the Debtors and the Equity Committee to resolve the objections without  
19 the necessity of a contested Court hearing. This parallel process resulted in a consensual financing  
20 order, which was presented to and approved by the Court.

21 Applicant spent approximately 55.20 hours performing services in connection with  
22 financing/cash collections. Applicant's fees charged for services related to financing/cash  
23 collateral are \$29,478.00, which represents 16.9% of the total fees sought by this Application. The  
24 blended hourly rate for services performed in this regard is approximately \$534.02 per hour.

25 D. Relief from Stay/Adequate Protection Proceedings

26 During the Reporting Period, Applicant spent approximately .80 hours performing services  
27 in connection with relief from stay/adequate protection proceedings in connection with pleadings  
28 filed by the Debtors' former officers with respect to their prospective severance claims and

1 insurance proceeds. After conferring with counsel for the Equity Committee, Applicant did not  
2 file a response, as the matter was being addressed by both the Debtors and the Equity Committee.  
3 Applicant's fees charged for services related to asset analysis and recovery are \$360.00, which  
4 represents .2% of the total fees sought by this Application. The blended hourly rate for services  
5 performed in this regard is approximately \$450.00 per hour.

6 E. Meetings of and Communications with Creditors

7 During the Application Period, Brown Rudnick spent 21.30 hours performing services  
8 related to Meetings and Communication with Creditors, and charged fees for these services in the  
9 amount of \$12,307.50, which constitutes 7.1% of the fees associated with this Application. The  
10 blended hourly rate for services performed in this regard is approximately \$577.82 per hour.

11 Brown Rudnick's services for this category include preparation for and attendance at the  
12 meeting of creditors and continued meeting of creditors held pursuant to 11 U.S.C. §341(a), as  
13 well as meetings and communications with the Committee related to all of the matters set forth  
14 above, particularly with respect to the status of sale negotiations, Court hearings and ongoing  
15 progress in the case. Brown Rudnick has also fielded questions from unsecured creditors regarding  
16 status of the Chapter 11 proceedings.

17 F. Claims Administration and Objections

18 During the Application Period, Brown Rudnick spent 7.10 hours performing services  
19 related to Claims Administration and Objections, and charged fees for these services in the amount  
20 of \$4,792.50. Brown Rudnick's services in this regard included monitoring and performing initial  
21 analyses of filed claims in an effort to advise the Committee of the number and type of claims  
22 asserted against the Debtors, as well as the size of the overall claims pool in relation to the  
23 prospective sale proceeds.

24 G. Fee/Employment Application

25 During the Application Period, Brown Rudnick prepared the Committee's Application to  
26 Employ Brown Rudnick, as well as assisting with the preparation of the Committee's Application  
27 To Employ Province as Financial Advisor. Applicant communicated with the Committee and  
28 Province regarding a budget for services to be performed in connection with the sale and

1 financing. Applicant also assisted the Committee in negotiating with the Equity Committee for a  
2 prospective joint retention of financial advisor, which was ultimately rejected. Applicant also  
3 conferred with the Office of the United States Trustee regarding a request for supplements to the  
4 Applications of Province and Brown Rudnick to clarify that compensation for Committee  
5 professionals would be subject to full review by the Court pursuant to 11 U.S.C. §330 and 331.  
6 Applicant also reviewed the objection to Province employment filed by the Equity Committee and  
7 updated the Committee with respect to the objection. After receiving direction from the  
8 Committee, Applicant filed a reply with respect to the Equity Committee objection and attended a  
9 hearing, where the Court approved the employment on the terms requested by the Committee.  
10 Applicant prepared orders approving employment and also began preparation of this application.  
11 Brown Rudnick spent a total of 58.40 hours performing services related to Employment and Fee  
12 Applications and charged fees for these services in the amount of \$29,937.00, which accounts for  
13 17.2% of the fees requested in this Application. The blended average hourly rate for services  
14 performed in this category was \$512.62.

15 H. Employment and Fee Application Objections

16 During the Application Period, Brown Rudnick evaluated the applications to employ  
17 professionals filed by the Debtors and the Equity Committee. Applicant notes that there is some  
18 overlap between this category and the fee/employment applications category, in that some of the  
19 billing associated with the Committee's defense of the Province Application is contained herein.  
20 Applicant also assisted the Debtors and the Equity Committee in resolving an issue related to  
21 Craig Hallum's application, which resulted in the Debtors filing a revised application and  
22 supplemental declarations. Brown Rudnick spent a total of 40.30 hours performing services  
23 related to Employment and Fee Applications and charged fees for these services in the amount of  
24 \$18,112.50, which accounts for approximately 10.4% of the fees requested in this Application.  
25 The blended average hourly rate for services performed in this category was \$449.44.

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1 3. DESCRIPTIVE AND DETAILED STATEMENT OF COSTS INCURRED

2 Attached and incorporated as Exhibit "5" is a schedule of costs and expenses incurred or  
3 paid by Applicant during the Reporting Period but not yet reimbursed. Exhibit "6" is a summary  
4 schedule recommended by the United States Trustee's Office. Applicant believes and represents  
5 that the costs and expenses are reasonable under the circumstances of this case and the various  
6 pleadings filed by the Committee. During the Reporting Period, Applicant incurred unreimbursed  
7 expenses of \$3,526.84 on behalf of the Committee for which Applicant seeks reimbursement.  
8 These expenses were actual expenses incurred in connection with the services rendered on behalf  
9 of the Committee. Expenses of this type are billed to and paid by Applicant's clients who pay  
10 monthly without contingency as to payment. Applicant has not included such expenses in its  
11 overhead and such expenses are not encompassed by its billing rates.

12 A. Document Copies

13 Applicant incurred the sum of \$1,453.40 for in-house document reproduction expenses  
14 during the Reporting Period. All in-house document copies are made after the case name and  
15 attorney or law clerk's code number are keyed into a computer system which calculates the  
16 number of copies by page. All of the Applicant's Committee and Trustee clients are charged  
17 \$0.10 per page for in-house document reproduction expenses.

18 B. Postage And Overnight Delivery

19 Applicant incurred the sum of \$44.55 in postage and overnight delivery charges for  
20 mailing during the Reporting Period. Postage is usually charged to clients when multiple  
21 envelopes are being mailed at a single time. A cost recovery system in the mail room records the  
22 client and amount to be charged.

23 C. Research

24 Applicant incurred \$406.60 in costs related to online computer research including  
25 Westlaw, Lexis, other online research and Pacer during the Reporting Period. Applicant does not  
26 use online services without first utilizing its own library and other resources.

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1 D. Messenger Services

2 Applicant incurred the sum \$837.24 in document delivery charges during the Reporting  
3 Period. Applicant has used document delivery services only when next-day or same-day delivery  
4 of documents and filing of pleadings was required. The charges are billed by the businesses which  
5 Applicant contracts to perform delivery services. In each instance when such expedited delivery  
6 of documents is required, a three-part delivery invoice is completed stating the name of the  
7 recipient of the document, the recipient's address and the client to be charged for the delivery.  
8 At the end of the month, the delivery services bill Applicant with copies of such invoices. The  
9 invoices are then charged to the client's account. The delivery services do not charge Applicant a  
10 set fee for their services; rather they charge Applicant fees according to the distance they are  
11 required to travel in order to deliver the documents. Whenever possible, Applicant uses Federal  
12 Express for deliveries in the Orange County and Los Angeles areas, since it is generally less  
13 expensive than a messenger service.

14 E. Audio Recording

15 Applicant incurred \$31.00 to obtain transcripts of relevant Court proceedings during the  
16 Reporting Period.

17 F. Telephone And Court Call

18 Applicant incurred \$3.43 in telephone charges during the Reporting Period primarily  
19 associated with long-distance calls to counsel and an additional \$190.00 in expenses associated  
20 with telephonic appearances at Court hearings.

21 G. Lodging

22 Applicant incurred \$235.62 in lodging expenses during the Reporting Period in connection  
23 with Ms. Castaldi's stay at the Marriott Warner Center in advance of the auction and sale hearing.

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4. THE COURT HAS AUTHORITY, AND SHOULD, APPROVE THE APPLICATION IN ITS ENTIRETY

A. Amount of Current Request For Compensation And Reimbursement

As set forth above and in the attached exhibits, during the Reporting Period Applicant incurred fees in the amount of \$174,319.50 and incurred expenses in the amount of \$3,526.84 in the Bankruptcy Case on behalf of the Committee, for which Applicant seeks interim payment in the total sum of \$177,846.34.

B. Legal Points And Authorities

The Bankruptcy Code provides that the Court can authorize payment of reasonable and necessary compensation and reimbursement of expenses.

(a) (1) After notice to the parties in interest and the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a trustee, an examiner, a professional person employed under section 327 or 1103

(A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) reimbursement for actual, necessary expenses.

Bankruptcy Code § 330.

The primary Ninth Circuit case discussing the test for determining a reasonable attorney's fee under Bankruptcy Code § 330 is *In re Yermakov*, 718 F.2d 1465 (9th Cir. 1983), which states:

"The primary method used to determine a reasonable attorney fee in a bankruptcy case is to multiply the number of hours expended by an hourly rate." *Id.* at 1471. Elsewhere, this has been referred to as the "lodestar" or basic fee, which, if warranted, can be adjusted upward or downward. *In re Powerine Oil Co.*, 71 B.R. 767 (9th Cir. BAP 1986). Applicant believes, based upon the foregoing and upon the supporting declaration and exhibits attached hereto, that the fees and costs requested are entirely reasonable given the benefit conferred on the Estate's creditors as contemplated under Bankruptcy Code §§ 330 and 331.

///


1 WHEREFORE, Brown Rudnick requests:

- 2 1. payment of interim compensation in favor of Brown Rudnick of \$174,319.50 for the  
3 actual, necessary and reasonable professional services rendered on behalf of the  
4 Committee during the Application Period;  
5 2. payment of interim reimbursement of expenses in favor of Brown Rudnick of  
6 \$3,526.84 for actual, necessary and reasonable expenses incurred on behalf of the  
7 Committee during the Application Period; and  
8 3. such other and further relief as the Court deems just and proper.

9 DATED: November 21, 2017

Respectfully submitted,

BROWN RUDNICK LLP

10 By:   
11 CATHRINE M. CASTALDI  
12 Attorneys for OFFICIAL COMMITTEE  
13 OF UNSECURED CREDITORS  
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**DECLARATION OF CATHRINE M. CASTALDI**

I, CATHRINE M. CASTALDI, declare as follows:

1. I am an attorney at law duly licensed to practice before the above-entitled Court, and am member of the law firm of Brown Rudnick LLP, attorneys of record for the Official Committee of Unsecured Creditors for the Bankruptcy Estate of Ironclad Performance Wear Corporation, a California corporation.

2. I have first-hand personal knowledge of the matters set forth herein, and if called upon as a witness, would and could competently testify thereto.

3. This declaration is submitted in support of First Interim Application for Allowance of Fees and Costs Filed by Brown Rudnick LLP [September 22, 2017 through November 9, 2017].

4. I am one of the designated professional responsible for overseeing the billing in this matter and for assuring compliance with the Guidelines for the United States Trustee relating to billing.

5. With the exception of the general sharing of compensation between members and employees of the firm, no agreement or understanding exists between Applicant and any other individual or entity for the sharing of compensation to be received for services rendered or the reimbursement of costs incurred in or in connection with this case.

6. A true and correct copy of the entered Order Granting Application To Confirm Employment of Brown Rudnick LLP As General Counsel To The Chapter 7 Trustee is attached as Exhibit "1."

7. Attached as Exhibit "2" is a true and correct copy of attorney time records for services rendered by professionals in this firm on behalf of the Trustee in the above entitled matter, together with a record of all costs incurred during the period of September 22, 2017 through November 9, 2017 (the "Reporting Period").

8. Attached as Exhibit "3" are certain summary schedules as recommended in the U.S. Trustee Guides.

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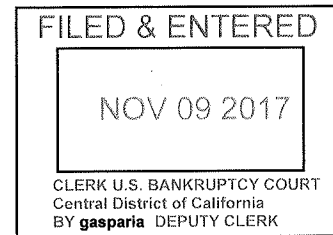
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EXHIBIT "1"

Case 1:17-bk-12408-MB Doc 197 Filed 11/09/17 Entered 11/09/17 15:12:39 Desc  
Main Document Page 1 of 2

BROWN RUDNICK LLP  
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Proposed Attorneys for OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SAN FERNANDO VALLEY DIVISION

In re:

IRONCLAD PERFORMANCE WEAR  
CORPORATION, a California corporation,  
Debtor and Debtor in Possession.

Lead Case No.: 1:17-bk-12408-MB

Jointly administered with: 1:17-bk-12409-MB

Chapter 11 Cases

In re:

IRONCLAD PERFORMANCE WEAR  
CORPORATION, a Nevada corporation,  
Debtor and Debtor in Possession.

**ORDER AUTHORIZING THE RETENTION  
OF BROWN RUDNICK LLP AS COUNSEL  
FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF IRONCLAD  
PERFORMANCE WEAR CORPORATION,  
A CALIFORNIA CORPORATION., NUNC  
PRO TUNC TO SEPTEMBER 22, 2017**

**[NO HEARING REQUIRED PURSUANT  
TO LOCAL RULE 2014-1(b)(1)]**

- ☐ Affects both Debtors  
☒ Affects Ironclad Performance Wear  
Corporation, a California corporation only  
☐ Affects Ironclad Performance Wear  
Corporation, a Nevada corporation only



Case 1:17-bk-12408-MB Doc 197 Filed 11/09/17 Entered 11/09/17 15:12:39 Desc  
Main Document Page 2 of 2

1 The Court read and considered the Application For Order Authorizing The Retention Of  
2 Brown Rudnick LLP ("BR") As Counsel For The Official Committee Of Unsecured Creditors Of  
3 Ironclad Performance Wear Corporation, a California corporation (the "Application") (Dkt 100),  
4 filed by The Official Committee of Unsecured Creditors (the "Committee") for the bankruptcy  
5 estate of Ironclad Performance Wear Corporation, a California corporation, which is being jointly  
6 administered with the bankruptcy estate of Ironclad Performance Wear Corporation, a Nevada  
7 corporation (the "Debtors"), the Notice of Application (Dkt. 102) and Statement Of  
8 Disinterestedness For Employment Of Professional Person Under FRBP 2014 (Dkt. 101) and  
9 Supplemental Declaration of Cathrine M. Castaldi in support of the Application (Dkt. 146), the  
10 Office of the United States Trustee's Objection, which was subsequently withdrawn (Dkt. 124 and  
11 173), and noting no other objection to the application pending, and it further appearing that proper  
12 notice of the Application has been given; and good cause having been shown:

13 IT IS HEREBY ORDERED that the Application is granted.

14 IT IS FURTHER ORDERED that the Committee is authorized to employ the law firm of  
15 Brown Rudnick LLP, as general counsel, effective as of September 22, 2017, with any  
16 compensation or cost reimbursement to be paid in such amounts as may be allowed by the Court  
17 upon proper application or applications filed pursuant to 11 U.S.C. § 330 and 331.

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23 Date: November 9, 2017



24 Martin R Barash  
25 United States Bankruptcy Judge  
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EXHIBIT "2"



One  
Financial  
Center  
Boston  
Massachusetts  
02111  
tel 617.856.8200  
fax 617.856.8201

IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS  
WINSPEED SPORTS (SHANGHAI) CO., LTD.  
CREDITORS ADJUSTMENT BUREAU  
14226 VENTURA BLVD.  
SHERMAN OAKS, CA 91423  
UNITED STATES

Invoice 725156  
Date Nov 21, 2017  
Client 034260

RE: IN RE IRONCLAD

## INVOICE

For professional services rendered in connection with the above captioned matter  
through November 9, 2017:

Matter No.	Matter Name	Fees	Costs	Total
034260.0001	IN RE IRONCLAD	174,319.50	0.00	174,319.50
	<b>Total</b>	<b>174,319.50</b>	<b>0.00</b>	<b>174,319.50</b>

Total Current Fees \$174,319.50

**Total Invoice \$174,319.50**

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IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
RE: IN RE IRONCLAD  
November 21, 2017

Invoice 725156  
Page 2

#### TASK SUMMARY

Task	Hours	Value
CASE ADMINISTRATION	32.40	18,279.00
ASSET ANALYSIS AND RECOVERY	10.80	5,958.00
ASSET DISPOSITION	87.40	55,095.00
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS	0.80	360.00
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS	21.30	12,307.50
FEE/EMPLOYMENT APPLICATIONS	58.40	29,937.00
FEE/EMPLOYMENT OBJECTIONS	40.30	18,112.50
FINANCING/CASH COLLECTIONS	55.20	29,478.00
CLAIMS ADMINISTRATION AND OBJECTIONS	7.10	4,792.50

#### TIME DETAIL

Date	Tkpr	Description	Hours	Value
CASE ADMINISTRATION				
09/22/17	JM	FINALIZE AND FILE NOTICE OF APPEARANCE OF PROPOSED PROFESSIONALS	0.2	39.00
09/22/17	CMC	DRAFT NOTICE OF APPEARANCE	0.5	337.50
09/22/17	CMC	RESEARCH AND REVIEW PLEADINGS RE: COMMITTEE;	4.1	2,767.50
09/22/17	CMC	CALLS WITH ROBERT STARK RE: COMMITTEE	0.2	135.00
09/22/17	CMC	CONFERENCE WITH FOUAD RE; SITUATIONAL OVERVIEW AND QUESTIONS RE: SAME;	0.4	270.00
09/22/17	CMC	RESEARCH RE: LOAN AND PRE-PETITION OFFERS AND SHARE-HOLDER LETTERS	2.5	1,687.50
09/22/17	CMC	REVIEW DOCKET;	0.4	270.00
09/22/17	CMC	CONFERENCE WITH FOUAD KURDI RE: RESPONSE TO MOTIONS;	0.5	337.50
09/22/17	CMC	REVIEW CALENDARING AND CASE DEADLINES;	0.3	202.50
09/22/17	CMC	RESEARCH AND BEGIN PREPARATION OF PLEADINGS AND BACKGROUND INFORMATION;	7.0	4,725.00



IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
RE: IN RE IRONCLAD  
November 21, 2017

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09/22/17	CMC	PREPARE FOR AND ATTEND MEETING WITH SAM MITTELDORF, PETER KRAVITZ AND ROBERT STARK;	2.3	1,552.50
09/25/17	JM	FILE OPPOSITION TO DEBTORS' MOTION FOR AN ORDER APPROVING FORM OF ASSET PURCHASE AGREEMENT; TELEPHONE CONFERENCE WITH CLERK OF COURT; EMAIL OPPOSITION TO PAUL FERDINANDS	1.0	NO CHARGE
09/26/17	CMC	CONFERENCES WITH FOUAD KURDI RE: CASE STRATEGY;	1.1	742.50
09/26/17	CMC	DRAFT EMAIL TO OCS COUNSEL RE: RESOURCE MANAGEMENT;	0.2	135.00
09/26/17	CMC	REVIEW EMAILS FROM SAM MAIZELL AND TANYA RE: RESOURCE MANAGEMENT;	0.1	67.50
09/27/17	CMC	DRAFT EMAIL TO CAROL CABELLO RE: MEETING SCHEDULE;	0.1	67.50
09/29/17	CMC	REVIEW SCHEDULING ORDER;	0.1	67.50
09/29/17	CMC	REVIEW SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS;	0.4	270.00
09/29/17	CMC	BEGIN DRAFT CONFIDENTIALITY AGREEMENT;	1.2	810.00
10/06/17	LRZ	REVIEW, REVISE AND SUPPLEMENT DRAFT NON-DISCLOSURE AGREEMENT BETWEEN DEBTORS AND COMMITTEE;	2.4	1,620.00
10/06/17	LRZ	REVIEW OF RELEVANT AUTHORITY REGARDING FILING DOCUMENTS UNDER SEAL TO DETERMINE CONFORMITY WITH PROPOSED NONDISCLOSURE AGREEMENT;	0.2	135.00
10/09/17	CMC	REVIEW AND RESPOND TO EMAIL FROM CAROL CABELLO RE: PROVINCE NDA;	0.1	67.50
10/09/17	CMC	FINALIZE NDA AND DRAFT EMAIL TO COMMITTEE MEMBERS RE: EXECUTION OF NDA IN ORDER TO RECEIVE CONFIDENTIAL INFORMATION;	0.4	270.00
10/11/17	CMC	REVIEW EMAIL FROM SAM MITTELDORF RE: NDA;	0.1	67.50
10/18/17	CMC	CONFERENCE WITH MARGAUX ROSS RE: APPROACH TO MULTIPLE COMMITTEES AND PROFESSIONALS;	0.2	135.00
10/19/17	CMC	CONFERENCE WITH MARGAUX ROSS RE: UST;	0.5	337.50
10/19/17	CMC	UPDATE FOUAD KURDI RE: STATUS OF CASE AND UPCOMING ASSIGNMENTS;	0.4	270.00
10/23/17	CMC	REVIEW DOCKET ENTRY RE: HEARING RE: MOTION FOR RELIEF FROM AUTOMATIC STAY;	0.1	67.50



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10/23/17	CMC	REVIEW EMAIL FROM FOUAD KURDI RE: STATUS AND ASSIGNMENTS;	0.1	67.50
10/26/17	CMC	REVIEW PRO HAC VICE APPLICATION PETER WOLFSON;	0.1	67.50
10/27/17	CMC	REVIEW ORDER PRO HAC VICE;	0.1	67.50
10/31/17	FK	SPEAK WITH C. CASTALDI RE SALE HEARING AND OTHER CASE STRATEGY ISSUES	0.4	150.00
11/06/17	CMC	CONFERENCE WITH TANIA MOYRON RE: STANDING ISSUES;	0.2	135.00
11/06/17	CMC	DRAFT EMAIL TO TANIA MOYRON RE: STANDING ISSUES;	0.1	67.50
11/06/17	CMC	EVALUATE STANDING ISSUES;	0.4	270.00
ASSET ANALYSIS AND RECOVERY				
09/28/17	CMC	REVIEW AND RESPOND TO EMAILS RE: MARKETING PROCESS;	0.2	135.00
09/28/17	CMC	CONFERENCE WITH TANIA RE: RESOLVING DIP ISSUES;	0.2	135.00
09/28/17	CMC	REVIEW EMAILS RE: MEETING WITH FINANCIAL ADVISOR AND DISCUSS SAME WITH TANIA MOYRON;	0.2	135.00
09/28/17	CMC	REVIEW EMAILS RE: APPROVAL OF MAIZELL PROPOSAL;	0.1	67.50
09/28/17	FK	DRAFT ANALYSIS OF DIP PROVISIONS (2.3); PARTICIPATE IN CALL WITH C. CASTALDI REGARDING DIP (.5); RESEARCH DIP STANDARD UNDER 9TH CIRCUIT CASE LAW (1.4)	4.2	1,575.00
09/28/17	CMC	REVIEW AND EXECUTE STIPULATION RE: DIP OBJECTION DEADLINE;	0.2	135.00
09/28/17	CMC	REVIEW EMAILS FROM PAUL FERDINANDS AND ROB BENDER;	0.2	135.00
09/28/17	CMC	REVIEW ENTERED BID PROCEDURES ORDER;	0.1	67.50
09/29/17	CMC	REVIEW FINANCIAL REQUEST WITH CAROL CABELLO AND FORWARD SAME TO EQUITY COMMITTEE FOR APPROVAL BEFORE SENDING TO DEBTOR;	0.2	135.00
09/29/17	CMC	CONFERENCE WITH TANIA MOYRON	0.1	67.50
10/02/17	CMC	CONFERENCE WITH MONICA KIM AND CONFERENCES WITH TANIA MOYRON RE: OPPOSITION AND PROPOSAL TO ALLEVIATE DISPUTE;	0.4	270.00
10/06/17	CMC	REVIEW DEBTOR'S PROPOSED CHANGES TO NDA;	0.2	135.00



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10/06/17	CMC	REVIEW EMAIL FROM TANIA MOYRON RE: NDA;	0.1	67.50
10/06/17	CMC	REVIEW AND RESPOND TO EMAIL FROM CHRISTINE TCHOI RE: DATA ROOM ACCESS;	0.2	135.00
10/06/17	CMC	CONFERENCE WITH LAUREL R. ZAESKE RE: CONFIDENTIALITY AGREEMENT SEAL PROVISIONS AND LOCAL RULES RE: SAME;	0.4	270.00
10/06/17	CMC	REVIEW REVISED CONFIDENTIALITY AGREEMENT AND SEND SAME TO KRIKOR;	0.7	472.50
10/06/17	CMC	DRAFT EMAIL TO KRIKOR AND FOLLOW UP PHONE CALL RE: COMMENTS TO NDA AND ACCESS TO DATA;	0.1	67.50
10/06/17	CMC	CONFERENCE WITH TANIA MOYRON RE: ACCESS TO DATA;	0.1	67.50
10/06/17	CMC	CONFERENCE WITH CAROL CABELLO RE: ACCESS TO DATA;	0.2	135.00
10/12/17	CMC	CONFERENCE WITH CAROL CABELLO RE: PREPARATION OF SCHEDULES FOR COMMITTEE REVIEW;	0.4	270.00
10/13/17	CMC	CONFERENCE WITH TANIA MOYRON RE: INDEMNITEE PROVISION AND REVIEW PROPOSED LANGUAGE;	0.3	202.50
10/20/17	CMC	REVIEW SUPPLEMENTAL MOTION TO ASSUME OR REJECT AND FOR DETERMINATION OF CURE AMOUNTS;	0.4	270.00
10/20/17	CMC	REVIEW APPLICATION FOR ORDER SHORTENING TIME;	0.2	135.00
10/20/17	CMC	REVIEW MOTION FOR RELIEF FROM AUTOMATIC STAY RE: CORDES AND AISENBERG;	0.6	405.00
10/20/17	CMC	REVIEW OBJECTION TO MOTION TO ASSUME OF REJECT FILED BY CORDES AND AISENBERG;	0.4	270.00
11/07/17	AS	CONFERENCE RE DISCOVERY	0.1	43.50
11/09/17	AS	CONFERENCE WITH C. CASTALDI RE DISCOVERY (.1); EMAILS RE CAPITAL ONE DISCOVERY AND CLAIMS (.1)	0.2	87.00
11/09/17	CMC	REVIEW CAPITAL ONE EMAIL FROM TONYA MOYRON;	0.1	67.50
ASSET DISPOSITION				
09/22/17	CMC	PROVIDE FOUAD KURDI WITH EXAMPLES FOR OPPOSITION TO BREAK UP FEE AND OTHER SALES PROCEDURES;	0.4	270.00
09/22/17	CMC	RESEARCH RE: BREAK UP FEES AND FA;	3.4	2,295.00
09/22/17	CMC	REVIEW 8KS AND SUMMARY	4.1	2,767.50



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09/23/17	FK	DRAFT BID PROCEDURES OBJECTION (3.6); CONDUCT RESEARCH FOR BID PROCEDURES OBJECTION	1.8	675.00
09/24/17	FK	DRAFT BID PROCEDURES OBJECTION (4.3); RESEARCH BREAK-UP FEE STANDARD IN 9TH CIRCUIT (1.0); RESEARCH MARKET RATE FOR BREAK-UP FEE (.6); DRAFT ARGUMENT REGARDING BREAK-UP FEE (.3); DISCUSS WITH C. CASTALDI BID PROCEDURES OBJECTION AND NECESSARY REVISIONS (.7)	6.9	2,587.50
09/25/17	FK	LISTEN TO BID PROCEDURES HEARING	3.8	NO CHARGE
09/25/17	CMC	PREPARE ARGUMENT FOR HEARING;	3.8	2,565.00
09/25/17	CMC	APPEAR AT HEARING AND CONFERENCE WITH PARTICIPANTS;	4.5	3,037.50
09/25/17	CMC	DRAFT BRIEF EMAIL TO COMMITTEE CHAIR AND FA RE: OUTCOME;	0.2	135.00
09/25/17	CMC	DRAFT EMAIL TO FOUAD KURDI RE: STATUS;	0.2	135.00
09/25/17	FK	DRAFT AND REVISE BID PROCEDURES OBJECTION (1.3); DRAFT MEMO SUMMARIZING AND ANALYZING DIP MOTION AND INTERIM ORDER (1.6); DRAFT SUMMARY OF ORAL ARGUMENT FOR BID PROCEDURES HEARING (.6)	3.5	1,312.50
09/25/17	CMC	FINALIZE COMMITTEE PLEADING;	1.2	810.00
09/25/17	CMC	REVIEW PLEADING FILED BY OFFICIAL EQUITY COMMITTEE;	0.7	472.50
09/26/17	JM	ORDER AUDIO RECORDING OF 9/25/17 HEARING	0.2	NO CHARGE
09/26/17	CMC	CONFERENCE WITH CHRISTINE TCHOI AND CAROL CABELLO RE: DUE DILIGENCE ON SALE AND CASH COLLATERAL;	0.5	337.50
09/26/17	CMC	REVIEW AND REVISE BID PROCEDURES ORDER;	0.8	540.00
09/26/17	CMC	PREPARE DETAILED MEMORANDUM RE: BID PROCEDURES;	2.1	1,417.50
09/26/17	CMC	REVIEW FILES RE: LANGUAGE FOR BID PROCEDURES ORDER;	0.4	270.00
09/26/17	CMC	REVIEW ADDITIONAL COMMENTS RE: BID PROCEDURES ORDER AND RESEARCH RE: SAME;	0.4	270.00
09/27/17	CMC	EXECUTE REVISED BID PROCEDURES ORDER;	0.1	67.50
09/27/17	CMC	REVIEW EMAILS AND AGREED REVISED BID PROCEDURE ORDER;	0.2	135.00
09/27/17	CMC	REVIEW EMAIL FROM RON BENDER RE: BID PROCEDURES ORDER	0.2	135.00





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09/27/17	CMC	REVIEW EMAIL AND COMMENTS TO PROPOSED BID PROCEDURES FROM TANIA MOYRON;	0.4	270.00
09/27/17	CMC	CONFERENCE WITH FOUAD RE: BID PROCEDURES ORDER;	0.4	270.00
09/27/17	CMC	DRAFT EMAIL TO RON BENDER RE: ADDITIONAL CHANGE TO BID PROCEDURES ORDER;	0.1	67.50
09/27/17	CMC	REVIEW EMAIL FROM RON BENDER RE: AUCTION SITE;	0.1	67.50
09/27/17	CMC	CONFERENCE RE: REVISED BID PROCEDURES ORDER;	0.1	67.50
09/27/17	CMC	PREPARE AGENDA FOR CALL WITH SAM MAIZEL AND TANYA MOYRON;	0.4	270.00
09/27/17	CMC	REVIEW ALTERNATE LANGUAGE PROPOSED BY FRANK CHILDRESS RE: BID PROCEDURES ORDER;	0.3	202.50
09/27/17	CMC	REVIEW REVISED BID PROCEDURES ORDER;	0.2	135.00
09/27/17	CMC	CALL TANYA MOYRON RE: BID PROCEDURES ORDER AND PROPOSED RESOLUTION RE: SAME;	0.2	135.00
09/27/17	CMC	REVIEW EMAIL FROM SAM MAIZEL RE: BID PROCEDURES ORDER;	0.1	67.50
09/27/17	CMC	REVIEW EMAIL FROM SAM MAIZEL RE: WITHDRAWAL LANGUAGE;	0.1	67.50
09/27/17	CMC	REVIEW EMAILS FROM RON BENDER AND FRANK CHILDRESS RE: BID PROCEDURES ORDER;	0.1	67.50
09/27/17	CMC	COORDINATE RESPONSE WITH OCEC RE: BID PROCEDURES ORDER AND RESPONSE OF RADIAN'S COUNSEL;	0.1	67.50
09/29/17	CMC	COORDINATE MEETING WITH DEBTOR'S INVESTMENT BANKER AND COMMITTEE PROFESSIONALS;	0.2	135.00
10/06/17	CMC	REVIEW AND RESPOND TO EMAIL FROM RON BENDER RE: SALE MOTION DRAFT;	0.1	67.50
10/09/17	CMC	REVIEW FILED SALE MOTION AND PROPOSED SALE ORDER;	0.4	270.00
10/09/17	CMC	REVIEW EMAIL FROM TANIA MOYRON RE: URGENT CALL RE: SALE MOTION;	0.1	67.50
10/09/17	CMC	CONFERENCE WITH TANIA MOYRON RE: SALE MOTION;	0.2	135.00
10/09/17	CMC	REVIEW GREULICH DECLARATION RE: SALE MOTION;	0.3	202.50
10/09/17	CMC	REVIEW CURE AMOUNTS FOR ASSUMPTION AGREEMENTS;	0.3	202.50



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10/09/17	CMC	EVALUATE DOCUMENTS RE: DUE DILIGENCE ROOM;	1.9	1,282.50
10/09/17	CMC	REVIEW SALE AND EXECUTORY CONTRACT NOTICES; TO ASSUME OR REJECT EXECUTORY CONTRACTS;	0.2	135.00
10/10/17	CMC	REVIEW EMAIL AND ATTACHMENTS FROM KRIKOR MESHEFEJIAN RE: CONFIDENTIAL SALE UPDATE AND SALE PROCESS MONITOR;	0.2	135.00
10/10/17	CMC	DRAFT EMAIL TO CAROL CABELLO RE: SALE PROCESS AND EVALUATION OF PROSPECTIVE BIDDERS AND OUTREACH;	0.1	67.50
10/10/17	CMC	DRAFT EMAIL TO KICKER RE: MATTER FILED UNDER SEAL AND REVIEW RESPONSE RE: SAME;	0.2	135.00
10/10/17	CMC	REVIEW SIDE LETTER AGREEMENT;	0.5	337.50
10/10/17	CMC	REVIEW AND ANALYZE SALE MOTION AND RESPONSE RE: SAME;	1.3	877.50
10/11/17	CMC	CONFERENCE WITH TANIA MOYRON RE: BID ASSESSMENT, REJECTION DAMAGES ESTIMATE AND DETERMINATION OF CONTRACTS TO BE ASSUMED AS IMPACTING NET SALE PRICE IF OVERBIDDERS;	0.8	540.00
10/11/17	CMC	REVIEW EMAIL FROM MARK ROBBA RE: NDA;	0.1	67.50
10/11/17	CMC	PREPARE MEMORANDUM RE: SALE MOTION;	0.8	540.00
10/11/17	CMC	CONFERENCE WITH CAROL CABELLO RE: RICKMAN SCHEDULED CALL AND OBJECTIVES;	0.2	135.00
10/11/17	CMC	CONFERENCE WITH CAROL CABELLO RE: ADDITIONAL PROSPECTS;	0.3	202.50
10/11/17	CMC	REVIEW AND ANALYZE MOTION TO ASSUME OR REJECT EXECUTORY CONTRACTS AND DRAFT MEMORANDUM RE: SAME;	1.3	877.50
10/12/17	CMC	PREPARE FOR AND ATTEND CALL WITH TANIA MOYRON AND SAM MAIZELL RE: SALE MOTION AND DATA ROOM CONCERNS;	0.3	202.50
10/12/17	CMC	CONFERENCE WITH RON BENDER, KRIKOR M, SAM MAIZELL AND TANIA MOYRON RE: SALE MOTION AND EVALUATION OF BIDS;	0.6	405.00
10/12/17	CMC	CONFERENCE WITH CAROL CABELLO RE: DISCUSSION WITH COMMITTEE RE: RECOMMENDATION TO SUPPORT SALE MOTION;	0.2	135.00
10/12/17	CMC	CONFERENCE WITH SAM AND TANIA RE: SALE MOTION ISSUES AND PROPOSED RESOLUTION RE: SAME;	0.3	202.50



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10/12/17	CMC	CONFERENCE WITH CAROL CABELLO RE: GRAINGER ISSUES;	0.2	135.00
10/12/17	CMC	PROVIDE SUPPLEMENTAL COMMENTS RE: COMMITTEE UPDATE;	0.4	270.00
10/12/17	CMC	REVIEW APA AND BID PROCEDURES ORDER;	1.3	877.50
10/13/17	CMC	RESEARCH RE: CURE COST ISSUES AND REJECTION DAMAGES;	1.4	945.00
10/16/17	CMC	REVIEW SUPPLEMENT AND DISCUSS SAME WITH FOUAD KURDI;	0.4	270.00
10/16/17	FK	READ AND SUMMARIZE DEBTORS' SALE MOTION SUPPLEMENTAL (.3)	0.3	112.50
10/18/17	CMC	REVIEW EMAIL FROM CAROL CABELLO AND BRIGHTON-BEST INTERNATIONAL BANK REFERENCE LETTER;	0.1	67.50
10/19/17	CMC	CONFERENCE WITH PETER KRAVITZ RE: STATUS OF CASE;	0.3	202.50
10/19/17	CMC	CONFERENCE WITH FOUAD KURDI REGARDING STATUS OF CASE AND UPCOMING ASSIGNMENTS;	0.3	202.50
10/20/17	CMC	CONFERENCE WITH TANIA MOYRON RE: ADDITIONAL CONTRACTS AND OTHER DOCUMENTS BEING ADDED TO DILLIGENCE ROOM AND DISCUSSION RE: ADEQUACY OF NOTICE TO PROSPECTIVE BIDDERS;	0.2	135.00
10/20/17	CMC	DRAFT EMAIL TO CHRISTINE TCHOI RE: BIDDER UPDATE;	0.2	135.00
10/20/17	CMC	FURTHER EVALUATION OF CLAIMS AND COMPARISON OF SCHEDULES;	1.2	810.00
10/23/17	CMC	REVIEW NOTICE OF EXPEDITED HEARING;	0.3	202.50
10/24/17	CMC	TELEPHONE CONFERENCE WITH TANIA MOYRON RE: ASSET DISPOSITION AND EFFECT OF GRAINGER APPLICATION;	0.2	135.00
10/24/17	CMC	REVIEW ASSET PURCHASE AGREEMENT;	1.2	810.00
10/24/17	CMC	REVIEW PROJECT MONITOR UPDATE;	0.3	202.50
10/24/17	CMC	DRAFT REQUEST FOR INFORMATION REGARDING GRAINGER RESOLUTION;	0.1	67.50
10/26/17	CMC	CONFERENCE WITH CAROL CABELLO RE: AUCTION;	0.5	337.50
10/26/17	CMC	CONFERENCE WITH TANIA MOYRON RE: SHARING AUCTION ANALYTICS;	0.2	135.00
10/26/17	CMC	REVIEW APAS RE: PIP AND BRIGHTONS BEST;	1.1	742.50
10/26/17	CMC	REQUEST FOLLOW UP INFORMATION RE: GRAINGER NEGOTIATIONS;	0.2	135.00



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10/27/17	FK	REVIEW SALE-RELATED PLEADINGS IN ADVANCE OF SALE HEARING	0.5	187.50
10/27/17	CMC	REVIEW EMAIL FROM KRIKOR MESHEFEJIAN RE: PIP CLEAN APA;	0.1	67.50
10/27/17	CMC	REVIEW EMAIL FROM KRIKOR MESHEFEJIAN RE: BBI BID;	0.1	67.50
10/27/17	CMC	REVIEW APA FROM BBI;	0.7	472.50
10/27/17	CMC	REVIEW EMAIL FROM GRAYSON T. WALTER;	0.1	67.50
10/27/17	CMC	REVIEW DEBTOR'S REPLY RE: AISENBERG AND CORDES OBJECTION TO SALE;	0.3	202.50
10/27/17	CMC	REVIEW DEBTOR'S ASSUMPTION/REJECTION SUPPLEMENT;	0.3	202.50
10/27/17	CMC	REVIEW PIP CLEAN APA;	0.7	472.50
10/27/17	CMC	REVIEW GRAINGER STIPULATIONS AND EMAIL FROM RON BENDER;	0.4	270.00
10/27/17	CMC	CONFERENCE WITH CAROL CABELLO RE: ASSET SALE HEARING AND ANALYSIS GIVEN GRAINGER STIPULATION;	0.3	202.50
10/27/17	CMC	REVIEW EQUITY COMMITTEE JOINDER IN DEBTOR'S OPPOSITION;	0.1	67.50
10/27/17	CMC	PREPARE FOR SALE HEARING AND REVIEW PLEADINGS FILED IN SUPPORT;	2.1	1,417.50
10/28/17	CMC	REVIEW PROPOSED SALE ORDER FROM BBI AND REVISED BBI APA;	0.5	337.50
10/28/17	CMC	REVIEW EMAILS FROM CHRISTINE TCHOI AND CAROL CABELLO;	0.1	67.50
10/28/17	CMC	REVIEW EMAIL FROM RON BENDER RE: AUCTION PROCESS;	0.2	135.00
10/29/17	CMC	TRAVEL TO SAN FERNANDO VALLEY RE: COURT APPEARANCE SALE HEARING;	2.0	1,350.00
10/30/17	CMC	MEETING WITH COMMITTEE FA RE: SALE HEARING;	1.0	675.00
10/30/17	CMC	ATTEND SALE HEARING AND TRAVEL FROM;	10.5	7,087.50
10/31/17	CMC	REVIEW SALE ORDER;	0.7	472.50
10/31/17	CMC	DRAFT EMAIL TO RON BENDER RE: SALE ORDER AND HEARING;	0.1	67.50
10/31/17	CMC	CONFERENCE WITH FOUAD KURDI RE: SALE RESULT;	0.1	67.50
10/31/17	CMC	REVIEW RESPONSES FROM VARIOUS PARTIES RE: SALE ORDER;	0.1	67.50
11/01/17	CMC	REVIEW SALE ORDER;	1.3	877.50
11/01/17	CMC	CONFERENCE WITH MARGAUX ROSS RE: SALE ORDER HEARING;	0.1	67.50



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11/01/17	CMC	FURTHER SALE ORDER HEARING;	1.0	675.00
11/01/17	CMC	CONFERENCE WITH TANIA MOYRON RE: SALE ORDER ISSUES;	0.2	135.00
11/03/17	CMC	SALE ORDER HEARING CONTINUED;	2.6	1,755.00
11/06/17	CMC	CALL TO ART RUEGER RE: CAPITOL BANK;	0.1	67.50
11/06/17	CMC	DRAFT MEMORANDUM RE: SALE;	1.5	1,012.50
11/07/17	CMC	CONFERENCE WITH ART RUEGER RE: CAPITOL ONE;	0.2	135.00
11/07/17	CMC	REVIEW EMAIL FROM GEOFF GREULICH RE: POST-CLOSING ISSUES;	0.1	67.50
RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS				
10/24/17	FK	REVIEW PLEADINGS RE RELIEF FROM AUTOMATIC STAY (.5)	0.5	187.50
11/06/17	CMC	CONFERENCE WITH J. MENDEZ RE: MOTION FOR RELIEF FROM STAY;	0.2	135.00
11/08/17	FK	REVIEW REPLY RE AUTOMATIC STAY RELIEF PROCEEDING	0.1	37.50
MEETINGS OF AND COMMUNICATIONS WITH CREDITORS				
09/22/17	CMC	PREPARE FOR COMMITTEE MEETING	2.5	1,687.50
09/22/17	CMC	PREPARE BYLAWS	1.1	742.50
09/26/17	CMC	DRAFT EMAIL TO CHRISTINE AND CAROL RE: COMMENTS TO COMMITTEE UPDATE;	0.2	135.00
10/02/17	CMC	FOLLOW UP WITH SAM MITTELMAN RE: CREDITOR WINDSPEED;	0.1	67.50
10/04/17	CMC	REVIEW EMAIL RE: EDITS TO PROPOSED EMAIL TO COMMITTEE;	0.2	135.00
10/06/17	CMC	DRAFT ACTIVITY UPDATE TO COMMITTEE RE: FINAL FINANCING APPROVAL;	0.6	405.00
10/06/17	CMC	REVIEW EMAIL FROM MARK ROBBA RE: NDA;	0.1	67.50
10/09/17	CMC	REVIEW EMAIL FROM CREDITOR AND RESPOND TO SAME;	0.1	67.50
10/09/17	CMC	REVIEW AND RESPOND TO EMAIL FROM BRENT WATERS RE: NDA;	0.1	67.50
10/10/17	SAM	PREPARE FOR 341(a) MEETING	0.9	297.00
10/10/17	CMC	CONFERENCE WITH SAM MONIZ RE: 341(A) MEETING OF CREDITORS;	0.4	270.00
10/11/17	CMC	REVIEW VOICEMAIL FROM TANIA MOYRON RE: MEETING OF CREDITORS;	0.1	67.50
10/11/17	CMC	CONFERENCE WITH SAM MONIZ RE: MEETING OF CREDITORS AND REVIEW EMAIL RE: CONTINUANCE OF SAME;	0.2	135.00



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10/11/17	CMC	DRAFT EMAIL TO CREDITORS COMMITTEE RE: STATUS OF CASE AND ISSUES RE: SAME;	0.3	202.50
10/11/17	SAM	341 MEETING OF CREDITORS, INCLUDING TRAVEL TIME	5.1	1,683.00
10/13/17	CMC	PREPARE FOR AND ATTEND MEETING OF CREDITORS;	1.0	675.00
10/16/17	CMC	REVIEW AND RESPOND TO EMAILS FROM MARGAUX ROSS AND TANIA MOYRON RE: CONTINUED MEETING OF CREDITORS;	0.2	135.00
10/18/17	CMC	REVIEW AND RESPOND TO EMAIL FROM MARGAUX ROSS RE: CONTINUED MEETING OF CREDITORS;	0.1	67.50
10/24/17	CMC	REVIEW AMENDED SCHEDULES AND CLAIMS RE: PREPARATION FOR 341(A);	1.0	675.00
10/25/17	CMC	PREPARE FOR AND ATTEND MEETING OF CREDITORS;	6.0	4,050.00
10/27/17	CMC	REVIEW EMAIL FROM CAROL CABELLO AND DRAFT UPDATE TO COMMITTEE RE: AUCTION PROCESS;	0.4	270.00
10/27/17	CMC	REVIEW EMAIL FROM BRENT WATERS RE: AVAILABILITY FOR MONDAY;	0.1	67.50
10/27/17	CMC	REVIEW EMAIL FROM SAM MITTELDORF RE: MONDAY CONTACT INFORMATION;	0.1	67.50
10/27/17	CMC	REVIEW EMAIL FROM MARK ROBBA RE: PROXY;	0.1	67.50
11/06/17	CMC	REVIEW AND RESPOND TO EMAIL FROM MARK ROBBA RE: SALE UPDATE;	0.3	202.50
FEE/EMPLOYMENT APPLICATIONS				
09/22/17	CMC	DRAFT APPLICATION TO EMPLOY	1.4	945.00
09/27/17	CMC	REVIEW APPLICATIONS TO EMPLOY AND PROVIDE GUIDANCE RE: CONFLICTS REVIEW;	0.4	270.00
09/27/17	CMC	CONFERENCE WITH FOUAD KURDI RE; FA APPLICATION TO BE EMPLOYED;	0.2	135.00
09/27/17	CMC	CONFERENCE WITH FOUAD KURDI RE: PRO HAC VICE;	0.1	67.50
09/28/17	CMC	REVIEW AMENDED MAILING MATRIX AND ARRANGE ADDITIONAL CONFLICT CHECKS BASED ON NEW INFORMATION;	0.2	135.00
09/29/17	CMC	CONFERENCE WITH MARGAUX ROSS RE: DEBTOR'S CONCERNS WITH EMPLOYMENT OF FINANCIAL ADVISOR;	0.3	202.50
10/02/17	CMC	CONFERENCE WITH PETER KRAVITZ RE: PROPOSED BUDGET;	0.2	135.00



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10/03/17	FK	REVIEW RETENTION APPLICATION TEMPLATE AND REQUIREMENTS	0.2	75.00
10/04/17	FK	DRAFTED RETENTION APPLICATION FOR COMMITTEE (1.3); DRAFTED DECLARATION FOR C. CASTALDI FOR APPLICATION (1.0); RESEARCH CONFLICTS ISSUE RELATING TO RETENTION APPLICATION (.5); DRAFT NOTICE FOR RETENTION APPLICATION (.4)	3.2	1,200.00
10/05/17	CSE	DRAFT BROWN RUDNICK RETENTION APPLICATION	1.3	344.50
10/05/17	FK	DRAFT RETENTION APPLICATION DECLARATION (1.7); DRAFT RETENTION APPLICATION (1.5); DISCUSS WITH C. ANEMIA RETENTION APP ISSUES (.2)	3.5	1,312.50
10/06/17	FK	FINALIZE RETENTION APPLICATION DOCUMENTS	1.5	562.50
10/06/17	CSE	MODIFICATIONS TO BROWN RUDNICK RETENTION APPLICATION AND DECLARATION	1.8	477.00
10/11/17	CMC	REVIEW EMAIL RE: APPLICATION;	0.2	135.00
10/11/17	CMC	REVIEW EMAIL FROM TANIA MOYRON RE: EMPLOYMENT OF FA AND EQUITY COMMITTEE ALLEGED ISSUES WITH SAME;	0.1	67.50
10/11/17	CMC	DRAFT EMAIL TO TANIA MOYRON RE: EMPLOYMENT OF FA;	0.2	135.00
10/11/17	CMC	DRAFT STATEMENT OF DISINTERESTEDNESS;	0.5	337.50
10/11/17	CMC	REVIEW AND FINALIZE APPLICATION TO BE EMPLOYED FOR BROWN RUDNICK;	1.2	810.00
10/12/17	CMC	CONFERENCE WITH FOUAD KURDI RE: AUTHORITY FOR COMMITTEE RETENTION OF FINANCIAL ADVISOR;	0.2	135.00
10/12/17	CMC	REVIEW AND REVISE PROVINCE EMPLOYMENT APPLICATION;	0.4	270.00
10/12/17	CMC	REVIEW AND REVISE APPLICATION TO EMPLOY;	0.5	337.50
10/12/17	CMC	REVIEW AND RESPOND TO EMAIL FROM CHRISTINE TCHOI;	0.1	67.50
10/12/17	FK	RESEARCH ISSUE RE FA RETENTION (1.3); DRAFT SUMMARY OF FA RETENTION CASE LAW (.5); DISCUSS RETENTION APP ISSUE WITH C. CASTALDI (.2)	2.0	750.00
10/13/17	JSM	REVIEW AND ANALYZE REVISIONS TO DRAFT INDEMNITY AGREEMENT RE: DEBTOR'S FINANCIAL ADVISOR; REVIEW UNITED ARTISTS CASE; TELEPHONE CONFERENCE WITH CATHRINE M. CASTALDI	0.5	375.00



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10/13/17	CMC	CONFERENCE WITH JOEL MILIBAND RE: INDEMNIFICATION PROVISIONS AND PROPOSED REVISIONS.	0.5	337.50
10/13/17	CMC	REVIEW COMMENTS BY CAROL CABELLO RE: APPLICATION;	0.4	270.00
10/13/17	CMC	REVIEW AND FINALIZE APPLICATION TO EMPLOY;	1.4	945.00
10/13/17	CMC	REVIEW NOTICE OF EMPLOYMENT APPLICATION AND EXECUTE SAME;	0.3	202.50
10/13/17	FK	DRAFT APPLICATION TO FA'S RETENTION	1.8	675.00
10/16/17	CMC	REVIEW AND REVISE STATEMENT OF DISINTERESTEDNESS FOR PROVINCE FIRM FOR REVIEW BY CABELLO;	0.4	270.00
10/18/17	JSM	CONFERENCE WITH CATHRINE M. CASTALDI RE: EMPLOYMENT ISSUES RE: CREDITORS' COMMITTEE FINANCIAL ADVISOR	0.4	300.00
10/18/17	CMC	CALLS AND EMAILS TO CAROL CABELLO AND CHRISTINE TCHOI AND RESPOND TO SAME RE: APPLICATION AND OFFERS TO WORK WITH EQUITY COMMITTEE;	0.2	135.00
10/18/17	CMC	STANDARDS FOR COMMITTEE EMPLOYMENT OF PROFESSIONALS;	1.9	1,282.50
10/20/17	HU	REVIEW OBJECTIONS TO APPLICATION FOR EMPLOYMENT (0.6); ANALYZE LEGAL THEORIES FOR RESPONSES TO OBJECTIONS TO APPLICATION FOR EMPLOYMENT (1.7);	2.3	644.00
10/22/17	HU	DRAFT MEMO RE: PROVINCE APP	2.0	560.00
10/23/17	HU	STRATEGIZE RE: RESPONSES TO U.S. TRUSTEE'S OBJECTIONS TO APPLICATION FOR EMPLOYMENT (0.4); RESEARCH LOCAL LAW REGARDING RETENTION UNDER SECTION 328 (1.3); STRATEGIZE RE: FIRST DRAFT OF RESPONSE TO U.S. TRUSTEE'S OBJECTIONS (0.3); DRAFT RESPONSE TO U.S. TRUSTEE'S OBJECTIONS (1.7)	3.7	1,036.00
10/23/17	CMC	CONFERENCE WITH FOUAD KURDI RE: SUPPLEMENTAL DECLARATIONS;	0.2	135.00
10/23/17	CMC	REVIEW AND REVISE SUPPLEMENT IN REPLY;	2.1	1,417.50
10/23/17	CMC	CONFERENCE WITH HONIEH UDENKA RE: DECLARATIONS;	0.3	202.50
10/23/17	CMC	DRAFT EMAIL TO CHRISTINE TCHOI;	0.1	67.50
10/23/17	CMC	REVIEW AND SUPPLEMENT APPLICATION;	0.8	540.00
10/24/17	CMC	REVIEW EMAILS FROM MARGAUX ROSS RE: SUPPLEMENTAL DECLARATIONS;	0.1	67.50





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10/24/17	CMC	PREPARE DETAILED EMAIL TO PROVINCE RE: TIMING OF FILING REPLY;	0.2	135.00
10/24/17	CMC	REVIEW AND FINALIZE REPLY;	0.5	337.50
10/24/17	CMC	REVIEW AND SUPPLEMENT DECLARATION OF CMC RE: EMPLOYMENT;	0.7	472.50
10/24/17	CMC	REVIEW SUPPLEMENTAL DECLARATION OF CROL CABELLO AND REVISE SAME;	0.5	337.50
10/26/17	CMC	FINALIZE SUPPLEMENTAL DECLARATION;	0.2	135.00
10/26/17	CMC	CONFERENCE WITH TANIA MOYRON RE: SUPPLEMENTAL DECLARATION SAMPLE;	0.1	67.50
10/27/17	CMC	REVIEW EMAIL AND JOINDER RE: PROVINCE APPLICATION FROM DEBTOR'S COUNSEL;	0.2	135.00
10/31/17	CMC	CONFERENCE WITH J. MENDEZ RE: SERVICE LIST FOR REPLY;	0.1	67.50
10/31/17	CMC	CONFERENCE WITH FOUAD KURDI RE: STANDING AND SUPPLEMENTING ARGUMENTS RE: REPLY;	0.3	202.50
11/01/17	CMC	REVIEW AND REVISE REPLY AND DISCUSS SAME WITH ARJUN SIVAKUMAR;	0.5	337.50
11/01/17	CMC	BEGIN DRAFT FEE APPLICATION;	1.4	945.00
11/02/17	AS	PREPARE CASTALDI DECLARATION FOR REPLY IN SUPPORT OF APPLICATION TO EMPLOY PROVINCE (1.0); PREPARE REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF REPLY IN SUPPORT OF APPLICATION TO EMPLOY PROVINCE (.8); COMPILE EXHIBITS FOR REPLY BRIEF (.4); CONFERENCES WITH C. CASTALDI AND C. WOLCHUCK RE BRIEF FILING (.2); REVISIONS TO BODY OF REPLY BRIEF (.8); REVIEW LOCAL RULES (.1)	3.3	1,435.50
11/03/17	AS	FINAL PROOFING AND FILING OF REPLY BRIEF DOCUMENTS (.6); CONFERENCE WITH C. WOLCHUCK RE SERVICE REQUIREMENTS (.3)	0.9	NO CHARGE
11/06/17	CMC	REVIEW DETAILED TIME ENTRIES FOR FEE APPLICATION;	1.1	742.50
11/06/17	CMC	DRAFT PROPOSED ORDER APPROVING EMPLOYMENT;	0.4	270.00
11/06/17	CMC	PREPARE DECLARATION RE: NON- OPPOSITION;	0.3	202.50
11/07/17	CMC	PREPARE PROPOSED ORDER RE: EMPLOYMENT OF BROWN RUDNICK;	0.3	202.50
11/07/17	CMC	REVIEW EMAIL FROM RON BENDER RE: FEE STATUS AND EMAIL CAROL CABELLO AND NANCY STODDARD RE: SAME;	0.2	135.00



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11/08/17	FK	REVIEW PROFESSIONAL RETENTION ORDERS	0.2	75.00
11/08/17	CMC	TRAVEL RE: PROVINCE APPLICATION;	1.9	1,282.50
11/09/17	CMC	PREPARE FOR AND ATTEND HEARING RE: APPLICATION TO EMPLOY PROVINCE;	6.0	4,050.00
FEE/EMPLOYMENT OBJECTIONS				
09/29/17	CMC	REVIEW EMPLOYMENT APPLICATION RE: CRAIG HALLUM CAPITAL GROUP LLC;	0.3	202.50
10/02/17	CMC	REVIEW EMAIL FROM TANIA MOYRON RE: EQUITY COMMITTEE'S PLANNED OPPOSITION TO COMMITTEE EMPLOYMENT OF FA;	0.2	135.00
10/02/17	CMC	CONFERENCE WITH TANIA MOYRON RE: PROPOSAL FOR SHARED FA, AND COMMITTEE INTENTIONS RE: MOVING FORWARD WITH FA EMPLOYMENT;	0.2	135.00
10/02/17	CMC	DRAFT EMAIL AND CONFERENCE WITH CAROL CABELLA RE: EQUITY COMMITTEE ISSUES AND PROPOSAL RE: SAME;	0.3	202.50
10/06/17	CMC	REVIEW EMAIL FROM LESLIE PLIGHT AND RESPOND TO SAME RE: POTENTIAL TAX ADVICE;	0.2	135.00
10/06/17	CMC	REVIEW AND REVISE NOTICE OF EMPLOYMENT APPLICATION;	0.7	472.50
10/06/17	CMC	REVIEW AND REVISE EMPLOYMENT APPLICATION;	1.0	675.00
10/06/17	CMC	CONFERENCE WITH TANIA MOYRON RE: LIMITED SCOPE FOR JOINT ENGAGEMENT OF FA OR RESOLUTION OF OBJECTION TO EMPLOYMENT OF FA;	0.2	135.00
10/06/17	CMC	REVIEW AND RESPOND TO EMAIL FROM FOUAD KURDI RE: NOTICE OF APPLICATION TO BE EMPLOYED;	0.1	67.50
10/06/17	CMC	REVIEW PROPOSED APPLICATION TO EMPLOY STUBBS ALDERTON & MARKILES RE: TRADEMARK AND SPECIAL LITIGATION COUNSEL;	0.4	270.00
10/06/17	CMC	REVIEW DENTONS APPLICATION FOR EMPLOYMENT BY COMMITTEE OF EQUITY SECURITY HOLDERS;	0.4	270.00
10/12/17	CMC	REVIEW INDEMNITY LANGUAGE PROPOSED BY TANIA MOYRON RE: CRIAG HALLUM;	0.4	270.00
10/12/17	CMC	REVIEW AND RESPOND TO EMAIL FROM KRIKOR M. AND TANIA MOYRON RE: CONTINUING RESPONSE RE: CRAIG HALLUM AND STATUS OF DISCUSSIONS RE: SAME;	0.2	135.00
10/12/17	CMC	EVALUATE EQUITY COMMITTEE STANDING;	0.3	202.50



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10/12/17	CMC	REVIEW EMPLOYMENT AGREEMENT RE: CRAIG HALLUM;	0.6	405.00
10/13/17	CMC	CONFERENCE RE: CRAIGN HALLUM INDEMNITEE AGREEMENT;	0.2	135.00
10/13/17	CMC	REVIEW STIPULATION RE: EXTENSION OF TIME AND EXECUTE SAME AND REFER TO KRIKOR;	0.3	202.50
10/13/17	CMC	REVIEW AND REVISE AGREEMENT RE CRAIG HALLUM	0.4	270.00
10/18/17	CMC	REVIEW EMAIL FROM KRIKOR MESHEFEJIAN RE: CRAIG HALLUM ACCEPTANCE OF PROPOSED INDEMNITY LANGUAGE;	0.1	67.50
10/18/17	CMC	CALL TO TANIA MOYRON RE: CRAIG HALLUM STATUS RE: EQUITY COMMITTEE APPROVAL;	0.1	67.50
10/19/17	CMC	REVIEW OBJECTION TO EMPLOYMENT OF COMMITTEE FA;	0.4	270.00
10/19/17	FK	SPEAK WITH C. CASTALDI ABOUT FA OBJECTION (.3); REVIEW EC FA OBJ (.4); RESEARCH RETENTION RELATED SECTIONS (.3)	1.0	375.00
10/19/17	CMC	REVIEW DENTON'S APPLICATION;	0.4	270.00
10/20/17	CMC	REVIEW FILING BY OFFICE OF THE UNITED STATES TRUSTEE AND EVALUATE SAME;	0.2	135.00
10/20/17	CMC	EVALUATE OBJECTION OF EQUITY COMMITTEE TO OCC EMPLOYMENT OF PROVINCE;	1.4	945.00
10/20/17	CMC	CONFERENCE WITH FOUAD KURDI RE: RESPONSE;	0.3	202.50
10/20/17	CMC	DRAFT EMAIL TO CHRISTINE TCHOI RE: UST OBJECTION;	0.1	67.50
10/20/17	CMC	CONFERENCE WITH TANIA MOYRON RE: RESOLUTION OF INDEMNITY ISSUE RE: C-H;	0.2	135.00
10/20/17	CMC	REVIEW SUPPLEMENTAL DECLARATION AND APPLICATION RE: CH TO ADDRESS INDEMNITY AND DISGORGEMENT ISSUES;	0.2	135.00
10/20/17	FK	DRAFT REPLY TO EQUITY COMMITTEE'S OPPOSITION TO PROVINCE APPLICATION (2.1); CONDUCT RESEARCH RELATING TO RULE 2014(A) STANDARDS (1.2); CONDUCT RESEARCH ON DIFFERENCES BETWEEN RETENTION UNDER 328 AND 330 (1.4)	4.7	1,762.50
10/21/17	FK	DRAFT REPLY TO EQUITY COMMITTEE'S OPPOSITION TO PROVINCE APPLICATION	3.9	1,462.50
10/22/17	FK	DRAFT REPLY TO EQUITY COMMITTEE'S OPPOSITION TO PROVINCE APPLICATION (3.2); RESEARCH UNSECURED CREDITOR DUTIES (1.5)	4.7	1,762.50



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10/23/17	FK	DRAFT REPLY TO US TRUSTEE APPLICATION OBJ (1.7); RESEARCH SEC 328 AND SEC 330 RETENTION DIFFERENCES (1.8); DRAFT REPLY TO EQUITY COMMITTEE OBJECTION TO PROVINCE APPLICATION (3.7); INCORPORATE EDITS TO REPLY TO EQUITY COMMITTEE OBJECTION TO PROVINCE APPLICATION (1.1)	8.3	3,112.50
10/24/17	FK	DRAFT DECLARATION FOR BROWN RUDNICK RE TRUSTEE OBJECTION (1.5); DRAFT DECLARATION FOR PROVINCE RE TRUSTEE OBJ (2.3)	3.8	1,425.00
10/27/17	CMC	REVIEW SUPPLEMENTAL DECLARATION OF STEVE RICKMAN RE: CRAIG-HALLUM APPLICATION;	0.2	135.00
10/31/17	FK	RESEARCH STANDING ISSUE RE EMPLOYMENT RETENTION (1.4); DRAFT REPLY TO OPPOSITION TO PROVINCE RETENTION (1.0)	2.4	900.00
11/01/17	FK	DRAFT REPLY TO EQUITY COMMITTEE OPPOSITION TO PROVINCE RETENTION	1.5	562.50
FINANCING/CASH COLLECTIONS				
09/26/17	CMC	REVIEW EMAIL FROM FRANK CHILDRESS AND COMPARE ORDER;	0.2	135.00
09/26/17	CMC	REVIEW RESPONSIVE EMAIL FROM MONICA KIM AND FRANK CHILDRESS RE: REDUCTION IN AMOUNT;	0.1	67.50
09/26/17	CMC	CALL WITH TANYA RE: CASH COLLATERAL ORDER;	0.2	135.00
09/26/17	CMC	REVIEW EMAILS FROM PARTIES RE: FINALIZING CASH COLATERAL ORDER AND EXECUTE SAME;	0.2	135.00
09/26/17	CMC	REVIEW EMAIL RE: ADDITIONAL CHANGES TO CASH COLLATERAL ORDER AND PROPOSED CHANGES;	0.4	270.00
09/26/17	CMC	REVIEW AND APPROVE CASH COLLATERAL ORDER;	0.5	337.50
09/26/17	CMC	CONFERENCE WITH TANIA RE: CASH COLLATERAL ORDER;	0.2	135.00
09/26/17	FK	REVIEW AND MARK-UP BID PROCEDURES ORDER (.8); RESEARCH ADEQUATE PROTECTION LAW IN 9TH CIRCUIT (1.9); RESEARCH SECTION 507 AS IT RELATES TO CLAIM PRIORITY (.9).	3.6	1,350.00
09/27/17	CMC	RESEARCH RE: DIP PROVISIONS;	2.1	1,417.50
09/27/17	FK	DRAFT DIP ANALYSIS (1.6); RESEARCH ADEQUATE PROTECTION CASE LAW IN DEFINED SCENARIO (1.1)	2.7	1,012.50



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09/27/17	CMC	EVALUATE DIP DEFAULT PROVISIONS;	1.7	1,147.50
09/27/17	CMC	CONFERENCE WITH SAM MAIZEL AND TANIA MOYRON RE: MEETING WITH FA AND STRATEGY WITH RESPECT TO DIP;	0.3	202.50
09/28/17	CMC	REVIEW DIP DEFAULT PROVISIONS AND DISCUSS SAME WITH F. KURDI RE: POTENTIAL FOR SECURED CREDITOR FORECLOSURE;	1.8	1,215.00
09/29/17	FK	DRAFT MEMORANDUM RE DIP ANALYSIS (2.4); RESEARCH AND ANALYZE DEFAULT PROVISIONS IN DIP CREDIT AGREEMENT (.6)	3.0	1,125.00
09/29/17	CMC	REVIEW DETAILED ANALYSIS RE: DEFAULT PROVISIONS AND SALE ANALYSIS;	0.5	337.50
09/29/17	CMC	CONFERENCE WITH FOUAD KURDI RE: FINANCING;	0.5	337.50
09/29/17	CMC	CONFERENCE WITH CAROL CABELLO RE: DEFAULT INTEREST RATE;	0.2	135.00
09/29/17	CMC	REVIEW 8-K AND EMAIL FROM FOUAD KURDI RE: DEFAULT AND SOLIDITY OF RADIAN'S OFFER;	0.3	202.50
10/02/17	CMC	REVIEW EMAIL FROM FRANK CHILDRESS RE: ADVANCE;	0.1	67.50
10/02/17	CMC	CONFERENCE WITH CAROL CABELLO RE: PROPOSED DIP AND REASONABLENESS OF PROVISIONS;	0.3	202.50
10/02/17	CMC	CONFERENCE WITH TANIA MOYRON RE: DIP AND COMMITTEE OBJECTIONS RE: SAME;	0.4	270.00
10/02/17	FK	DRAFT DIP OBJECTION (3.6); RESEARCH 9TH CIRCUIT PRECEDENT FOR DIP OBJECTION (1.2)	4.8	1,800.00
10/02/17	CMC	SUPPLEMENT DIP OPPOSITION;	4.8	3,240.00
10/02/17	CMC	STRATEGIZE RE: DIP FINANCING;	0.5	337.50
10/03/17	CMC	REVIEW EMAILS FROM MONICA KIM AND FRANK CHILDRESS RE: DIP ISSUES AND PROPOSED RESOLUTION;	0.1	67.50
10/03/17	CMC	FINALIZE DIP FINANCING OPPOSITION;	8.2	5,535.00
10/03/17	FK	DRAFT OBJECTION TO DIP MOTION (4.3); RESEARCH STANDARDS FOR RELEASES IN 9TH CIRCUIT (.8); INCORPORATE REVISIONS TO DIP MOTION (.9); DISCUSS WITH C. CASTALDI PROPOSED ARGUMENTS FOR DIP OBJECTION (.2); RESEARCH CASE LAW RELATING TO SECTION 364 (1.1)	7.5	2,812.50



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10/03/17	JM	FILE AND SERVICE OPPOSITION TO DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN INTERIM ORDER: (I) AUTHORIZING THE DEBTORS TO (A) OBTAIN POSTPETITION FINANCING; (B) UTILIZE CASH COLLATERAL; (II) GRANTING ADEQUATE PROTECTION; (III) SCHEDULING A FINAL HEARING; AND (IV) GRANTING RELATED RELIEF	0.4	78.00
10/04/17	CMC	RESEARCH RE: CASH COLLATERAL ISSUES;	1.4	945.00
10/04/17	FK	COMMUNICATE WITH COUNSEL FOR EQUITY COMMITTEE RE DIP ORDER (.2); DRAFT UPDATE AND QUESTIONS REGARDING STATUS OF DIP ORDER NEGOTIATIONS (.3); REVISE PROPOSED DIP ORDER	1.4	525.00
10/04/17	CMC	REVIEW FINANCING ORDER AND REVISE WITH TANIA MOYRON RE: RESOLVING OBJECTIONS; AND COMMUNICATIONS WITH FRANK CHILDRESS AND MONICA KIM;	2.5	1,687.50
10/04/17	CMC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH FRANK CHILDRESS, MONICA KIM, SHARON WEISS, TANIA MOYRON AND PETER WOLFSON RE: DIP AGREEMENT AND ORDER AND PRESERVATION OF COMMITTEE RIGHTS;	1.0	675.00
10/04/17	CMC	REVIEW EMAIL AND CONFERENCE WITH FOUAD KURDI;	0.3	202.50
10/05/17	FK	REVIEW AND MARK-UP PROPOSED FINAL DIP ORDER	2.0	750.00
10/06/17	CMC	APPEARANCE AT FINAL HEARING RE: DIP FINANCING;	0.6	405.00
10/27/17	CMC	REVIEW EMAIL RE: BUDGET V. ACTUAL;	0.1	67.50
11/07/17	FK	REVIEW PLEADINGS RE STIPULATION BETWEEN OEC AND RADIAN	0.3	112.50
CLAIMS ADMINISTRATION AND OBJECTIONS				
10/09/17	CMC	REVIEW CLAIM OF TXU ENERGY FOR \$1,752.73;	0.1	67.50
10/10/17	CMC	REVIEW AND RESPOND TO EMAIL FROM CREDITOR;	0.2	135.00
10/12/17	CMC	REVIEW EMAIL FROM BRENT WATERS AND RESPOND TO SAME;	0.2	135.00
10/18/17	CMC	CONFERENCE WITH TANYA MOYRON RE: CLAIMS;	0.1	67.50
10/18/17	CMC	REVIEW CLAIMS;	2.4	1,620.00
10/20/17	CMC	REVIEW GRAINGER PROOF OF CLAIM;	0.2	135.00
10/20/17	CMC	REVIEW FILED CLAIMS AND SCHEDULES;	1.1	742.50
10/23/17	CMC	REVIEW CORRESPONDENCE RE: CLAIMS AMS;	0.3	202.50



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10/23/17	CMC	REVIEW RADIANS FILED PROOF OF CLAIM;	0.2	135.00
10/23/17	CMC	REVIEW SHAREHOLDER REQUEST, FORWARD SAME TO TANIA MOYRON AND REVIEW CONFIRMATION;	0.1	67.50
10/24/17	CMC	REVIEW FILED CLAIMS;	0.2	135.00
10/24/17	CMC	REVIEW REVISED WATERFALL RE: NEW CLAIMS FILED AND SCHEDULED;	0.4	270.00
10/26/17	CMC	RESEARCH RE: REJECTION DAMAGES ISSUES;	1.4	945.00
10/27/17	CMC	REVIEW AMENDED SCHEDULES E/F FILED BY DEBTOR;	0.2	135.00
<b>Total Hours and Fees</b>			<b>313.7</b>	<b>174,319.50</b>

#### TIME SUMMARY

Professional	Hours		Rate	Value
CATHRINE M. CASTALDI	196.8	hours at	675.00	132,840.00
JOEL S. MILIBAND	0.9	hours at	750.00	675.00
LAUREL R. ZAESKE	2.6	hours at	675.00	1,755.00
FOUAD KURDI	3.8	hours at	0.00	0.00
FOUAD KURDI	86.2	hours at	375.00	32,325.00
SAMUEL A. MONIZ	6.0	hours at	330.00	1,980.00
ARJUN SIVAKUMAR	0.9	hours at	0.00	0.00
ARJUN SIVAKUMAR	3.6	hours at	435.00	1,566.00
HONIEH UDENKA	8.0	hours at	280.00	2,240.00
CAROL S. ENNIS	3.1	hours at	265.00	821.50
JEANNIE MENDEZ	1.2	hours at	0.00	0.00
JEANNIE MENDEZ	0.6	hours at	195.00	117.00
<b>Total Fees</b>				<b>174,319.50</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**EXHIBIT "3"**



**Brown Rudnick LLP**  
**Professional Fee Statement**  
**Ironclad: Official Committee of Unsecured Creditors**

<u>Activity Category</u>	<u>Sep</u> 2017	<u>Oct</u> 2017	<u>Nov</u> 2017	<u>Total</u>
Case Administration	2,160.00	15,646.50	472.50	18,279.00
Asset Analysis and Recovery	2,587.50	3,172.50	198.00	5,958.00
Asset Disposition	16,792.50	33,510.00	4,792.50	55,095.00
Relief from Stay/Adq Protection Proceedings	0.00	187.50	172.50	360.00
Meetings of and Communications with Creditors	135.00	11,970.00	202.50	12,307.50
Fee/Employment Applications	810.00	19,449.00	9,678.00	29,937.00
Fee/Employment Objections	202.50	17,347.50	562.50	18,112.50
Financing/Cash Collections	9,697.50	19,668.00	112.50	29,478.00
Claims Administration and Objections	<u>0.00</u>	<u>4,792.50</u>	<u>0.00</u>	<u>4,792.50</u>
<b>Total</b>	<b><u>32,385.00</u></b>	<b><u>125,743.50</u></b>	<b><u>16,191.00</u></b>	<b><u>174,319.50</u></b>

**Brown Rudnick LLP**  
**Professional Fee Summary**  
**Ironclad: Official Committee of Unsecured Creditors**

**Case Administration**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	24.20	16,335.00
Laurel R. Zacske	P	675.00	2.60	1,755.00
Fouad Kurdi	A	0.00	3.80	0.00
Fouad Kurdi	A	375.00	0.40	150.00
Jeannie Mendez	CA	0.00	1.20	0.00
Jeannie Mendez	CA	195.00	<u>0.20</u>	<u>39.00</u>
<b>Total</b>			<b><u>32.40</u></b>	<b><u>18,279.00</u></b>

**Asset Analysis and Recovery**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	6.30	4,252.50
Arjun Sivakumar	A	435.00	0.30	130.50
Fouad Kurdi	A	375.00	<u>4.20</u>	<u>1,575.00</u>
<b>Total</b>			<b><u>10.80</u></b>	<b><u>5,958.00</u></b>

**Asset Disposition**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	74.40	50,220.00
Fouad Kurdi	A	375.00	<u>13.00</u>	<u>4,875.00</u>
<b>Total</b>			<b><u>87.40</u></b>	<b><u>55,095.00</u></b>

**Relief from Stay/Adq Protection Proceedings**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	0.20	135.00
Fouad Kurdi	A	375.00	<u>0.60</u>	<u>225.00</u>
<b>Total</b>			<b><u>0.80</u></b>	<b><u>360.00</u></b>

**Meetings of and Communications with Creditors**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	15.30	10,327.50
Samuel A. Moniz	A	330.00	<u>6.00</u>	<u>1,980.00</u>
<b>Total</b>			<b><u>21.30</u></b>	<b><u>12,307.50</u></b>

**Brown Rudnick LLP**  
**Professional Fee Summary**  
**Ironclad: Official Committee of Unsecured Creditors**

**Fee/Employment Applications**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	29.80	20,115.00
Joel S. Miliband	P	750.00	0.90	675.00
Arjun Sivakumar	A	0.00	0.90	0.00
Arjun Sivakumar	A	435.00	3.30	1,435.50
Fouad Kurdi	A	375.00	12.40	4,650.00
Honieh Udenka	A	280.00	8.00	2,240.00
Carol S. Ennis	P	265.00	<u>3.10</u>	<u>821.50</u>
<b>Total</b>			<b><u>58.40</u></b>	<b><u>29,937.00</u></b>

**Fee/Employment Objections**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	10.00	6,750.00
Fouad Kurdi	A	375.00	<u>30.30</u>	<u>11,362.50</u>
<b>Total</b>			<b><u>40.30</u></b>	<b><u>18,112.50</u></b>

**Financing/Cash Collections**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	29.50	19,912.50
Fouad Kurdi	A	375.00	25.30	9,487.50
Jeannie Mendez	CA	195.00	<u>0.40</u>	<u>78.00</u>
<b>Total</b>			<b><u>55.20</u></b>	<b><u>29,478.00</u></b>

**Claims Administration and Objections**

	<u>Type</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Cathrine M. Castaldi	P	675.00	<u>7.10</u>	<u>4,792.50</u>
<b>Total</b>			<b><u>7.10</u></b>	<b><u>4,792.50</u></b>

EXHIBIT "4"



**Partner**

Litigation and Arbitration

+1.949.752.7100

jmiliband@brownrudnick.com

**Practice Areas**

Litigation and Arbitration

Bankruptcy and Corporate

Restructuring

**Education**

University of San Diego, School  
of Law – J.D., *magna cum*  
*laude*, 1977

University of California,  
Riverside – B.A., *Honors*, 1973

**Joel S. Miliband**

Joel S. Miliband is a partner in the Litigation and Arbitration group in California, and the General Counsel and Chief Legal Officer of the Firm. He has a wide range of experience in complex business and commercial litigation, including class actions, contract, financial fraud, corporate and partnership disputes, franchise litigation, real estate and construction, representing individuals, private business organizations, Fortune 500 companies, and governmental entities and agencies. He also represents parties in corporate insolvency matters. Joel has appeared in state and federal trial and appellate courts, as well as alternative dispute resolution forums hearing arbitrations.

**REPRESENTATIVE MATTERS**

***Bankruptcy and Corporate Restructuring***

- Successfully represented non-debtor developer in connection with its interests in 30 real estate debtor entities in litigation with Lehman Bros., who had financed the projects with \$2.3 billion before Lehman's collapse in September 2008.
- Represented a water agency incident to its attempt to acquire the assets of a regional water company wholly owned by the debtor in the *Landsource Communities Development, LLC* bankruptcy.
- Represented a city in connection with securing valuable water rights in over 9,000 acres of real estate wholly owned by a California debtor, subject to secured debt of a lender in its own bankruptcy proceeding in Texas.
- Represented the Official Creditors' Committee in a large real estate investment/development company case and successfully negotiated with the debtor to confirm a 100% plan of reorganization to pay more than \$12 million in creditor claims.
- Successfully represented the debtor, a landmark 500-room hotel adjacent to the Convention Center and Disneyland in Anaheim, California, in confirming a plan of reorganization restructuring the hotel's \$21 million secured debt.
- Represented the largest creditor in the Del Taco bankruptcy case, and participated as client's representative on the Official Creditors' Committee.



*J. Miliband / p. 2*

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***General Litigation***

- Successfully represented CEO of international pharmaceutical company in multi-jurisdictional litigation to regain control of the company's international operations.
- Defended and favorably settled claims arising out of a leveraged restructuring and sale transaction brought against the former founder and principal of one of the nation's largest manufacturers of nutraceuticals, by creditors holding \$225 million of bond debt acting pursuant to a confirmed chapter 11 liquidating plan of reorganization.
- Successfully represented real estate partnership in litigation over control of a 105-acre mixed-use commercial real estate project including a retail center and nearly 4 million square feet of constructed or entitled office, hotel and residential space.
- Recovered seven-figure settlement for client after obtaining pre-judgment writ of attachment in a contract claim seeking payment for 1,734,000 gallons of denatured fuel grade ethanol.
- Recovered judgment after trial, affirmed on appeal, for client arising out of damages resulting from defendant's refusal to honor contractual supply obligations to take advantage of price spike in the spot market following Hurricane Katrina.
- In over three years of litigation, successfully defended developer of large shopping center against lender with secured claim in excess of \$90 million, allowing developer to ultimately sell the project.
- Recovered \$7 million judgment for client after arbitration award based on overpayment of royalty and license fees.

***Class Action***

- Successfully represented a class of 20,000 California teachers seeking recovery for the diversion of cash in the operation of more than thirty publicly syndicated real estate limited partnerships, achieving a recovery in excess of \$20 million.



*J. Miliband / p. 3*

- Defended and obtained a favorable settlement for two subsidiaries of a Fortune 500 company against claims of fraud and unfair business practices with claims aggregating in excess of \$200 million.
- Successfully defended class action brought by enrollee in a tax preparer course on behalf of thousands of putative class members, defeating class certification in the trial court, and obtaining dismissal of the appeal from that denial.
- Successfully defended the largest car auction in the nation against class action brought on behalf of used automobile dealers, obtaining reversal in the appellate court of initial class certification and thereafter defeating class certification in the trial court.
- In a unique class action matter, represented a class of investors with members of the Official Creditors Committee as representative plaintiffs, obtaining a recovery against an attorney for malpractice.

#### **Franchise Cases**

- Represented organization of restaurant franchisees in securing contract rights through negotiation, litigation, and ultimately representation in connection with the franchisor's bankruptcy.
- Successfully defended one the nation's largest franchisors with over 10,000 company and franchise owned locations, against a franchisee alleging breach of contract and unfair business practices, obtaining not only a dismissal of all claims, but a monetary judgment in favor of the client as well as injunctive relief enforcing a covenant not to compete.
- Successfully defended nationwide franchisor against contract and fraud claims of franchisee, obtaining dismissal of all claims before trial and defending the judgment on appeal.

#### **SPEAKING ENGAGEMENTS**

- Ernst & Young - 2009 REIT CFO Roundtable (Panel Member) Distressed Real Estate – Problems and Opportunities
- University of California, Riverside, Keynote Speaker - Annual Law Conference (2006)



J. Millband / p. 4

- Frequent lecturer and speaker on legal ethics and professionalism as well as substantive legal topics

#### PROFESSIONAL AFFILIATIONS

- Member, California Committee of Bar Examiners (2012-present)
- Member, Judicial Council of California (2008-2011)
- State Bar of California (Vice President 2005, Member, Board of Trustees 2002-2005)
- Association of Business Trial Lawyers; Editor, ABTL Report (OC Chapter) (2002-2003)
- Lawyer Delegate, Ninth Circuit Judicial Conference (1999-2002)
- Orange County Bar Association (President 2000)
- Desert Bar Association (President 1988)
- American Bar Association
- Federal Bar Association
- Master of the Bench, American Inns of Court (Peter M. Elliott Inn)

#### AWARDS & HONORS

- Recognized by Woodward/White's *The Best Lawyers in America* for Commercial Litigation, Bet-the-Company Cases and Bankruptcy Litigation.
- Named in December 2012 *American Lawyer Magazine* as Top Rated Lawyer in Commercial Bankruptcy Creditor-Debtor Rights.
- Noted as one of Orange County's top bankruptcy attorneys 2011-2013 by *OC Metro Magazine*.

#### BAR ADMISSIONS

- California
- Ninth Circuit Court of Appeals
- US District Court for the Southern, Central, Northern, and Eastern Districts of California





*J. Miliband / p. 5*

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**COMMUNITY & BUSINESS MEMBERSHIPS**

- Business Forums International (Newport Beach Chapter)
- Association for Corporate Growth (Orange County Chapter)
- Rotary Club (Newport Beach Sunrise)

## BROWN RUDNICK

### Cathrine M. Castaldi | Attorney Biography



**Partner**  
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2211 Michelson Drive  
Suite 700  
Irvine, CA 92612

#### PRACTICE AREAS

- Litigation
- Bankruptcy and Corporate Restructuring

Cathrine Castaldi is a partner in Brown Rudnick's Bankruptcy & Corporate Restructuring group in California. Cathrine concentrates her practice in the areas of bankruptcy, insolvency, reorganization and commercial litigation. She has represented Chapter 11 debtors, equity security holders, secured and unsecured creditors, trustees and committees in connection with bankruptcy cases, foreclosure actions, adversary proceedings and related commercial litigation.

Her experience in Chapter 11 cases involves representation of debtors from the inception of the case to matters involving plan confirmation and related issues, DIP financing arrangements, cash collateral disputes, valuation issues and litigation.

Cathrine also represents individuals and middle market businesses in litigation matters incident to bankruptcy or out-of-court restructuring, including fraudulent conveyance and preference litigation.

#### EDUCATION

- University of San Diego, School of Law, 1991  
J.D.
- University of California, Los Angeles, 1987  
B.A., Political Science  
Minor, Women's Studies

#### REPRESENTATIVE MATTERS

- Representation of CEP Liquidation Trustee Peter S. Kravitz.
- Representation of the Official Committee of Unsecured Creditors of ClearEdge Power, a venture capital-funded fuel cell company, in its Chapter 11 case in the Northern District of California.
- Representation of trustee in Chapter 11 proceeding pending in the Central District of California, resulting in a substantive consolidation of a non-debtor entity and the negotiation and execution of an asset sale involving an operating oil company.
- Representation of Chapter 11 debtor in reorganization of oil and gas company and related real property interests in the Central District of California.
- Representation of Official Committee of Equity Security Holders in confirming plan of reorganization for debt collection agency and replacing existing board of directors with elected equity committee representatives.
- Representation of Chapter 7 trustees as general and special counsel.
- Representation of real estate developers and other high net worth individuals in connection with defense of guarantee claims.
- Representation of publicly traded companies as creditors in multiple Chapter 11 and Chapter 7 proceedings.



## Cathrine M. Castaldi | Continued

### Castaldi / p. 2

#### SPEAKING ENGAGEMENTS

- Panelist, California Bankruptcy Forum, 29<sup>th</sup> Annual Insolvency Conference – New Developments Regarding 363 Sales, 2017
- Lecturer, UCI School of Law, Saturday Academy of Law, 2017
- Panelist, The Knowledge Group – “Distressed Debt Investing In The Oil & Gas Industry: Opportunity And Challenges,” 2017
- Panelist, Chief Bankruptcy Judge's Meeting, Ninth Circuit
- Panelist, Orange County Bankruptcy Forum
- Panelist, Orange County Bar Association
- Panelist, Federal Bar Association of Los Angeles
- Panelist, Chapman University School of Law
- Panelist, Western State School of Law

#### ARTICLES

- Cathrine M. Castaldi, (2014) *Planning Strategies For Corporations Filing Chapter 11 Bankruptcies in, Inside The Minds, Chapter 11 Bankruptcy and Restructuring Strategies, Leading Lawyers on Navigating Recent Trends, Cases, and Strategies Affecting Chapter 11 Clients*, Thompson Reuters/Aspatore Books, U.S.A.

#### PROFESSIONAL AFFILIATIONS

- Board of Directors, Brown Rudnick Charitable Foundation Corporation

#### COMMUNITY INVOLVEMENT

- Past President and Member, Orange County Charitable Fund
- Past President, Orange County Bar Association
- Past Board Member, Orange County Bar Association
- Past Chair, Commercial Law & Bankruptcy Section, Orange County Bar Association
- Ninth Circuit Judicial Conference, Lawyer Representative
- Bench Bar Coalition, State Bar of California
- Volunteer, Public Law Center
- Member, Federal Bar Association
- Member, California Bankruptcy Forum
- Member, Orange County Bankruptcy Forum
- Impact Giving, Grant Committee Member

#### BAR ADMISSIONS

- California
- Various United States District Courts and Bankruptcy Courts in California
- Ninth Circuit Court of Appeals

#### EDUCATION

- University of San Diego, School of Law – J.D., 1991
- University of California at Los Angeles – B.A., 1987

**Partner**

Litigation

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lzaeske@brownrudnick.com

**Practice Areas**

Litigation &amp; Arbitration

Bankruptcy and Corporate

Restructuring

**Education**University of Southern California  
Law Center – J.D., 1988University of Colorado – B.S.,  
1981**Laurel R. Zaeske**

Laurel Zaeske is a partner in Brown Rudnick's Litigation group in California. Laurel has more than twenty years of experience in handling complex business litigation matters and representing individuals, companies and trustees in contested bankruptcy proceedings.

Prior to becoming a lawyer, Laurel was a practicing CPA, where she worked with, among others, the national accounting firms Peat, Marwick, Mitchell & Co. and Arthur Andersen & Co. As a CPA, Laurel focused her practice in the areas of audit, private placements and business acquisitions. Much of Laurel's law practice involves contested financial matters which allows her to bring to bear both her experience as a CPA and a lawyer.

Laurel has been appointed and currently serves on the ADR/mediation panels with the United States District Court and Bankruptcy Court in the Central District of California and, where appropriate, incorporates mediation strategies to achieve client goals.

**REPRESENTATIVE MATTERS****Litigation**

- **CCR&R Inc. adv. Rainbow Disposal Co., Inc.:** Represented major Southern California waste hauler and processor in defense of claims by competitor for unfair business practice/anti-trust allegations under California state law and cross-claims for accounting and breach of contract where competitors were partners in the hauling and processing of a single municipality resulting in a \$6 million judgment on behalf of client. The case was subsequently settled before entry of final judgment.



L. Zaeske / p. 2

- ***In re the Custodianship of Alexander Reynolds Hughes:*** Ongoing representation of the Custodian of the heir of Herbalife founder, Mark Hughes, including representation of the Custodian in defense of a Petition for Review to the California Supreme Court of an order affirming denial of attorneys fees requested by Guardian's attorneys; and defending appeal of order in case of first impression as to the ability of trustees to seek contribution from custodianship to pay support obligation owed to minor. The California Supreme Court denied Petition for Review of order affirming denial of \$3.0 million in attorneys' fees requested by Guardian's attorneys.
- ***Enough For Everyone, Inc. v. Provo Craft & Novelty, Inc.:*** Represented the President and sole owner of Enough For Everyone, Inc. in a royalty dispute against Provo Craft & Novelty. Client was granted judgment of \$1.8 million, which was recently affirmed on appeal.
- ***Diamond, as Trustee of Brea Hospital Properties v. Snell & Wilmer, LLP:*** In two coordinated cases in the Orange County Superior Court, represented prominent regional law firm against claims prosecuted by the Bankruptcy Trustee of the failed Brea Community Hospital Corporation and the hospital's principals and parent company. After a five week jury trial, a defense verdict was rendered in favor of Snell & Wilmer.
- ***NZMP, Inc. v. Siegel, et al.:*** Defended a former principal of the predecessor corporation to the failed Global Health Sciences, one of the largest manufacturers of nutraceuticals in the United States and principal product supplier to Herbalife. The case was prosecuted, pursuant to a Chapter 11 liquidating plan, by creditors holding \$225 million of bonds issued in conjunction with the leveraged sale of the company. The case was favorably settled for the firm's client.
- ***ACC/Lincoln Savings Securities Litigation:*** Represented the plaintiff class of bondholders who recovered in excess of \$250 million from the professionals who assisted Charles Keating against whom a \$4.0 billion jury verdict was rendered in this notorious fraud case involving the collapse of Lincoln Savings & Loan, focusing on claims against the accountants and served as one of the trial attorneys.



L. Zaeske / p. 3

- **FTC v. First Alliance Mortgage Company:** Represented the Chairman and CEO of this publicly traded, national mortgage lender in multiple Federal Court coordinated class actions and lawsuits brought against him by the Federal Trade Commission and various States Attorney General alleging unlawful lending practices which were the subject of the New York Times and 20/20 features. The actions were settled in 2002 in a manner favorable to the client, thereby eliminating a nationwide exposure in excess of \$500 million.
- **TMI Partnership Litigation:** Part of team designated by the Court as lead counsel in this complex litigation on behalf of a class of approximately 20,000 California teachers seeking recovery for the diversion of cash in the operation of more than 30 publicly syndicated limited partnerships. Concluding in settlement payments of over \$20 million were made by the managers of the partnerships, their lawyers, banks and national accounting firm.

**Corporate Reorganization / Bankruptcy**

- **In re Stockwell Properties:** Represented the Bankruptcy Trustee and successfully liquidated millions of dollars in real estate and defended fraudulent transfer claims thereby preserving the assets for the benefit of the bankruptcy estate.
- **In re Hill Williams Income Funds:** Represented the Bankruptcy Trustee and prosecuted litigation against the professionals who aided and abetted the manager of these failed public syndications, which had raised and dissipated more than \$80 million in connection with the fraudulent real estate empire of developer Donald Hill Williams.
- **In re Bill L. Walters:** Represented the Bankruptcy Trustee in the notorious case of a Denver real estate developer and President of that city's Chamber of Commerce, who was accused, along with the son of President George H. W. Bush, of having responsibility for the multi-billion dollar collapse of Silverado Bank & Savings in the early 1990's.



L. Zaeske / p. 4

- ***In re Jack Clark:*** Represented the Bankruptcy Trustee in this bankruptcy case of former major league baseball player which was commenced as a "no asset" Chapter 7 liquidation. The Trustee was successful in having the case converted to a Chapter 11, where a Plan was confirmed within seven months providing for a 100% payout of more than \$2.5 million to unsecured creditors.

#### **SPEAKING ENGAGEMENTS & PUBLICATIONS**

- Laurel regularly lectures on trial preparation and substantive areas of commercial and bankruptcy law for the CEB and other professional organizations.
- While attending law school, Laurel served as an instructor in Management Accounting in undergraduate and MBA graduate programs at the University of Southern California, and continues to serve as a guest lecturer in USC's MBA program.
- Co-author, *Fraudulent Transfer: Litigation Under the Bankruptcy Code and State Law*, 29 Cal. Bankr. J. 255 (2007), which was cited by the 9th Circuit Court of Appeal in *In re JTS Corporation*, 2010 WL 3122867 (C.A.9 (Cal.))

#### **AWARDS & HONORS**

- Laurel was recognized as one of the Top Attorneys in Southern California in 2012 as published in the *Los Angeles Magazine*
- Laurel was also recognized by the Daily Journal for winning one of California's Top 10 defense verdicts of 2010

#### **COMMUNITY INVOLVEMENT & BUSINESS MEMBERSHIPS**

- Laurel serves as a Director of the California Bankruptcy Forum, and has twice served as Conference Chair and also served as Education Chair for its annual conference.
- Member, Orange County Bar Association; Chair of the Audit Committee (1998 – present); former Section Chair, Commercial Law and Bankruptcy Section



*L. Zaeske / p. 5*

- Former Director and Treasurer, Orange County Bankruptcy Forum
- Member, Newport Beach Chamber of Commerce; Chairman of the Board (2008-2009), Chief Financial Officer (2005-2008 and 2012-2013)
- Member, American Inns of Court
- Member, California Society of Certified Public Accountants
- Member, Federal Bar Association
- Member, Association for Corporate Growth, Orange County Chapter

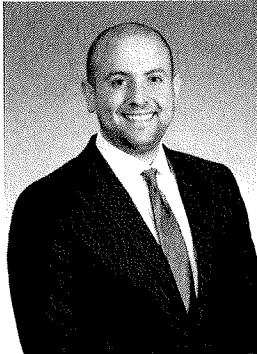
#### **BAR ADMISSIONS**

- California
- Colorado



## BROWN RUDNICK

### Fouad Kurdi | Attorney Biography



**Associate**

fkurdi@brownrudnick.com  
+1.617.856.8409  
Boston

**PRACTICE AREAS**

- Restructuring

Fouad Kurdi is an associate in Brown Rudnick's Restructuring Group.

Prior to joining Brown Rudnick, Fouad served as a Law Clerk to the Honorable Mary Walrath at the District of Delaware Bankruptcy Court. In this role, Fouad assisted Judge Walrath in drafting opinions and preparing for hearings in the busiest mega-chapter 11 district in the U.S.

Fouad has also served as Legal Coordinator to the Georgia State University College of Law Bankruptcy Assistance & Practice Program, a legal clinic that facilitates the pro bono representation of indigent chapter 7 debtors while providing third-year law students practical bankruptcy experience.

**PROFESSIONAL AFFILIATIONS**

- American Bankruptcy Institute
- Boston Bar Association, Bankruptcy Section
- State of Georgia, Bankruptcy Section

**PUBLICATIONS**

- "A Question of Power: Non-Consensual Third-Party Releases in Chapter 11 Plans," *Norton Journal of Bankruptcy Law & Practice*, August 2016
- "The Power to Disband Committees: A Difference of Opinion," *American Bankruptcy Institute Unsecured Trade Creditors Newsletter*, June 2016
- "The Tax Injunction Act and the Transfer of Unemployment Experience Ratings Through §363(f) Sales," *Norton Journal of Bankruptcy Law & Practice*, August 2015
- "NOL Preservation for Bankrupt Companies: Deciding Between §382 (l)(5) and (l)(6)," *Association of Insolvency and Restructuring Advisors Journal*, Winter 2015
- "Pushing the Boundaries of Negotiation: Post-Petition Lock-Ups and the Anti-Solicitation Rule," *Norton Journal of Bankruptcy Law & Practice*, February 2015
- "Is Lung Disease 'Individual' Enough? In re Emoral and Why the Answer is No," *American Bankruptcy Institute Unsecured Trade Creditors Newsletter*, February 2015
- "The Cognitive Dissonance of §1115: Thinking Chapter 13, Acting Chapter 11," *Norton Journal of Bankruptcy Law & Practice*, August 2014
- "Outer Boundaries of Bankruptcy Court's Equitable Powers: Equitable Subordination and Equitable Disallowance" *American Bankruptcy Institute Unsecured Trade Creditors Newsletter*, February 2014

**BAR ADMISSIONS**

- Georgia
- Massachusetts (Pending)

**EDUCATION**

- Georgia State University, College of Law - J.D., *cum laude*, 2014
- Georgia State University, J. Mack Robinson College of Business - Master of Taxation, 2014
- University of Massachusetts, Boston - B.A. *magna cum laude*, 2011

**Associate**

Litigation

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asivakumar@brownrudnick.com

**Practice Areas**

Commercial Litigation

**Education**

Columbia Law School – J.D., 2013

*Harlan Fiske Stone Scholar*

Cornell University – B.A., 2010

**Arjun Sivakumar**

Arjun Sivakumar is an associate in Brown Rudnick's Commercial Litigation Group.

Arjun previously interned for the Honorable Robert Freedberg of the Superior Court of Pennsylvania, where he researched and drafted opinions disposing of civil and criminal appeals. Prior to that, he served as the Legal and Development Programs Coordinator for the Open Mind Company in Santa Monica, California.

In law school, Arjun was the Editor-in-Chief of the *Columbia Journal of Tax Law*.

**PUBLICATIONS**

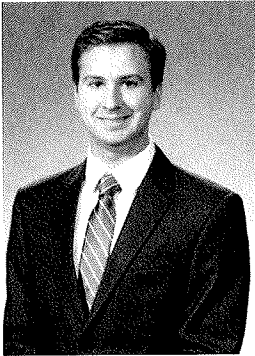
- "Owners Playing It Safe: A Law and Economics Explanation of Why Sports Franchises Relocate," 10 Willamette Sports L.J., November 2012

**BAR ADMISSIONS**

- California
- New York

## BROWN RUDNICK

### Samuel A. Moniz | Attorney Biography



**Associate**  
smoniz@brownrudnick.com  
+1.949.440.0234  
Orange County

**PRACTICE AREAS**  
• Commercial Litigation

Samuel A. Moniz is an associate in Brown Rudnick's Commercial Litigation Group.

Prior to joining Brown Rudnick, Samuel served as a Research Assistant to Professor Adam Winkler at the UCLA Law Library. In this role, he researched a variety of issues to constitutional law and assisted in the preparation of a book on the constitutional rights of corporate entities. While at UCLA School of Law, he also worked as a researcher for Professor Steven Bank, focusing on corporate law. He was an active participant in Moot Court.

#### BAR ADMISSIONS

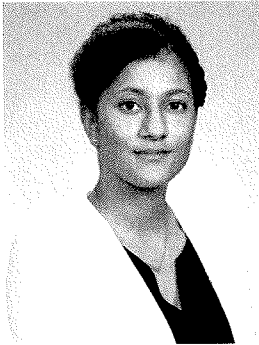
- Not Yet Admitted

#### EDUCATION

- UCLA School of Law - J.D., 2016
- U.C. Berkeley - B.A., *high honors*, 2011

## BROWN RUDNICK

### Honieh Udenka | Attorney Biography



**Associate**

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+1.949.440.0238

**PRACTICE AREAS**

- Litigation & Arbitration

Honieh Udenka is an associate in Brown Rudnick's Commercial Litigation Group.

Prior to joining Brown Rudnick, Honieh was a summer associate at Munger, Tolles & Olson, where she drafted client and internal memoranda. As part of the Appellate Litigation Clinic at UCI Law, Honieh worked with others to brief and argue a case before the Ninth Circuit Court of Appeals. Additionally, Honieh worked on several Alien Tort Statute cases as part of the International Human Rights Clinic at UCI Law, helping to draft both trial and appellate briefs. In law school, she served as the President of the Business Law Society, and sat on the board of the Underrepresented Students' Alliance.

**BAR ADMISSIONS**

- California

**EDUCATION**

- University of California, Irvine School of Law – J.D., 2017
- Eastern Mediterranean University – B.A., *high honors*, 2014

CAROL S. ENNIS

Carol S. Ennis is a senior paralegal at Brown Rudnick LLP with over 33 years experience as a bankruptcy paralegal. She received a Bachelor of Arts from the State University College at Oswego, New York in political science and Spanish in 1977 and began her career as a law librarian, moving on in 1980 to become a legal assistant at a major corporate service company. In 1984 she received a paralegal certificate from Manhattanville College in Purchase, New York and commenced working as a paralegal in the nation's largest computer leasing company, which was in Chapter 11 proceedings, operating under the direction of a court appointed trustee. She continued to work for that same chapter 11 trustee over the course of 14 years, managing the legal department in a subsequent significant case. In 1998 Ms. Ennis came to Brown Rudnick and generally works on large cases in which the firm represents official and unofficial creditor and equity committees. She also has considerable experience assisting with the preparation and filing of bankruptcy petitions and schedules and ongoing support in substantial chapter 11 debtor proceedings.

## **JEANNIE MENDEZ**

Jeannie Mendez has been a legal executive assistant and case administrator since 1984. Ms. Mendez has experience working in civil and bankruptcy matters and has substantial knowledge in all aspects of state and federal court litigation and bankruptcy practices. Ms. Mendez performs substantial legal work under the direction and supervision of an active member of the State Bar of California. Ms. Mendez obtained her Associates of Arts in Paralegal Studies in 2014 from Santa Ana College. Mr. Mendez is also a long-standing member of NALS of Orange County, as well as its parent corporation, NALS...the Association for Legal Professionals, acting as Chapter President.

EXHIBIT "5"



One  
Financial  
Center  
Boston  
Massachusetts  
02111  
tel 617.856.8200  
fax 617.856.8201

IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS  
WINSPEED SPORTS (SHANGHAI) CO., LTD.  
CREDITORS ADJUSTMENT BUREAU  
14226 VENTURA BLVD.  
SHERMAN OAKS, CA 91423  
UNITED STATES

Invoice 725156  
Date Nov 21, 2017  
Client 034260

RE: IN RE IRONCLAD

## INVOICE

For professional services rendered in connection with the above captioned matter  
through November 9, 2017:

Matter No.	Matter Name	Fees	Costs	Total
034260.0001	IN RE IRONCLAD	0.00	3,526.84	3,526.84
	<b>Total</b>	<b>0.00</b>	<b>3,526.84</b>	<b>3,526.84</b>

Total Current Costs \$3,526.84

**Total Invoice \$3,526.84**

b  
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IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
RE: IN RE IRONCLAD  
November 21, 2017

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**COST DETAIL**

<b>Date</b>	<b>Description</b>	<b>Value</b>
09/20/17	COPIES	0.20
09/22/17	COPIES	3.20
09/22/17	COPIES	2.40
09/22/17	COPIES	3.20
09/22/17	COPIES	2.20
09/22/17	COPIES	14.00
09/22/17	COPIES	1.80
09/22/17	COPIES	10.20
09/22/17	COPIES	9.40
09/22/17	COPIES	1.00
09/22/17	COPIES	1.00
09/22/17	COPIES	10.20
09/22/17	COPIES	21.60
09/22/17	COPIES	2.40
09/22/17	COPIES	0.60
09/22/17	COPIES	7.80
09/22/17	POSTAGE-IN HOUSE	0.46
09/25/17	COPIES	59.00
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09/25/17	COPIES	3.00
09/25/17	COPIES	0.20
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09/25/17	COPIES	0.20
09/25/17	COPIES	0.20
09/25/17	COPIES	4.20
09/25/17	COPIES	0.80
09/25/17	COPIES	2.40
09/25/17	COPIES	0.20
09/25/17	COPIES	0.20
09/25/17	ACCURROUTE SCAN	4.20



IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
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09/25/17	POSTAGE-IN HOUSE	5.60
09/25/17	COPIES	2.20
09/26/17	MESSENGER SERVICES - VENDOR: EXCEL GROUP EXCEL COURIERS- - NW7- W1- 31.08.17	29.17
09/26/17	COPIES	0.40
09/26/17	COPIES	0.20
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09/26/17	COPIES	3.20
09/26/17	COPIES	12.40
09/26/17	COPIES	5.00
09/26/17	COPIES	1.00
09/26/17	COPIES	4.00
09/27/17	COPIES	2.40



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09/27/17	COPIES	0.20
09/27/17	COPIES	1.60
09/27/17	COPIES	4.40
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09/28/17	COPIES	1.00
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10/02/17	COPIES	0.40



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10/02/17	COPIES	22.40
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10/03/17	COPIES	3.00
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10/03/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	40.00
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10/06/17	COPIES	0.80
10/06/17	COPIES	8.60



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10/06/17	COPIES	6.60
10/06/17	COPIES	0.80
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10/12/17	COPIES	0.40
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10/12/17	COPIES	0.60



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10/12/17	COPIES	0.40
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10/12/17	COPIES	12.20
10/12/17	COPIES	8.80
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10/12/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	143.00
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10/13/17	ACCURROUTE SCAN	1.20



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10/13/17	POSTAGE-IN HOUSE	5.52
10/13/17	ACCURROUTE SCAN	4.40
10/16/17	COPIES	0.60
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10/20/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 10/04/17	139.39
10/20/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 09/22/17	108.00
10/20/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 09/25/17	64.72



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10/20/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 09/26/17	94.33
10/20/17	MISC. EXPENSES - VENDOR: FIRST LEGAL NETWORK LLC 09/26/17	31.00
10/20/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 09/29/17	92.92
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10/20/17	COPIES	2.20
10/20/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
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10/22/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	35.00
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10/23/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	59.00
10/23/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	104.00





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10/24/17	COPIES	1.00
10/24/17	COPIES	1.00
10/24/17	COPIES	0.80
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10/25/17	COPIES	0.80
10/25/17	POSTAGE-IN HOUSE	4.37
10/25/17	ACCURROUTE SCAN	1.40
10/26/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 10/12/17	27.75
10/26/17	FILING FEE - VENDOR: FIRST LEGAL NETWORK LLC 10/12/17	325.00
10/26/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 10/12/17	21.53
10/26/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 10/13/17	141.43
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10/26/17	COPIES	9.00



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10/26/17	COPIES	7.20
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10/26/17	COPIES	1.40
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10/31/17	MESSENGER SERVICES - VENDOR: FIRST LEGAL NETWORK LLC 10/17/17	58.00



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11/01/17	COPIES	5.20
11/01/17	COPIES	2.60
11/01/17	COPIES	1.20
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11/03/17	COPIES	11.60



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11/03/17	COPIES	17.80
11/03/17	COPIES	3.60
11/03/17	COPIES	1.60
11/03/17	COPIES	0.80
11/03/17	COPIES	0.60
11/03/17	COPIES	0.20
11/03/17	ACCURROUTE SCAN	40.80
11/03/17	POSTAGE-IN HOUSE	14.40
11/03/17	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
11/03/17	OVERNIGHT DELIVERY UPS Tracking No: 1Z89EA350196773200 From: Caryn S. Wolchuck To: Hon. Martin R. Baras at U.S. Bankruptcy Court	30.00
11/06/17	COPIES	0.60
11/06/17	COPIES	1.20
11/06/17	COPIES	4.40
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11/06/17	POSTAGE-IN HOUSE	2.03
11/06/17	ACCURROUTE SCAN	9.20
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11/06/17	COPIES	1.20
11/06/17	COPIES	1.40



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11/06/17	COPIES	2.60
11/06/17	COPIES	0.40
11/06/17	COPIES	15.20
11/06/17	COPIES	15.20
11/06/17	OVERNIGHT DELIVERY UPS Tracking No: 1Z89EA350199953215 From: Jeannie Mendez To: Clerk to The Hon. Ma at United States Bankruptcy Court	30.00
11/07/17	COPIES	0.20
11/07/17	COPIES	0.20
11/07/17	COPIES	0.60
11/07/17	COPIES	3.20
11/07/17	TELEPHONE	1.36
11/07/17	COPIES	0.20
11/08/17	COURT CALL - VENDOR: DINERS CLUB 09/28/17	155.00
11/08/17	COURT CALL - VENDOR: DINERS CLUB 10/12/17	35.00
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11/08/17	COPIES	0.20
11/08/17	COPIES	1.40
11/09/17	HOTEL - VENDOR: CATHRINE CASTALDI 10/29/17	235.62
11/09/17	COPIES	0.60
11/09/17	COPIES	0.40
<b>Total Costs</b>		<b>3,526.84</b>



IRONCLAD: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
RE: IN RE IRONCLAD  
November 21, 2017

Invoice 725156  
Page 15

#### COST SUMMARY

Description	Value
COPYING (7,267 copies @ 0.20 = 1,453.40)	1,453.40
TELEPHONE	3.43
ON-LINE RESEARCH	406.60
DELIVERY SERVICES/MESSENGER	837.24
POSTAGE	44.55
OUT-OF-TOWN TRAVEL	235.62
OTHER	546.00
<b>Total Costs</b>	<b>3,526.84</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

EXHIBIT "6"

**Brown Rudnick LLP**  
**Expense Report**  
**Ironclad: Official Committe of Unsecured Creditors**

<u>Expense Category</u>	<u>Sep</u> 2017	<u>Oct</u> 2017	<u>Nov</u> 2017	<u>Total</u>
Filing Fee	0.00	325.00	0.00	325.00
Hotel	0.00	0.00	235.62	235.62
Messenger Services/Delivery	29.17	748.07	60.00	837.24
Telephone	0.00	2.07	1.36	3.43
Document Copies	317.60	747.60	388.20	1,453.40
Postage	6.06	22.06	16.43	44.55
Court Call	0.00	0.00	190.00	190.00
Misc Court Fee - Audio Req	0.00	31.00	0.00	31.00
Computer Research	<u>0.00</u>	<u>401.60</u>	<u>5.00</u>	<u>406.60</u>
<b>Total</b>	<b><u>352.83</u></b>	<b><u>2,277.40</u></b>	<b><u>896.61</u></b>	<b><u>3,526.84</u></b>



## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
2211 Michelson Drive, Suite 700, Irvine, CA 92612

A true and correct copy of the foregoing document entitled (*specify*): **FIRST INTERIM APPLICATION FOR ALLOWANCE OF FEES AND COSTS FILED BY BROWN RUDNICK LLP [SEPTEMBER 22, 2017 TO NOVEMBER 9, 2017]; DECLARATION OF CATHRINE M. CASTALDI** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) November 21, 2017, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) November 21, 2017, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

ICPW Liquidation Corporation,  
a California corporation  
15260 Ventura Blvd., 20th Floor  
Sherman Oaks, CA 91403

ICPW Liquidation Corporation,  
a Nevada corporation  
15260 Ventura Blvd., 20th Floor  
Sherman Oaks, CA 91403

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) November 21, 2017, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Martin R. Barash  
U.S. Bankruptcy Court  
21041 Burbank Blvd.  
Woodland Hills, CA 91367

☐ Service information continued on attached page

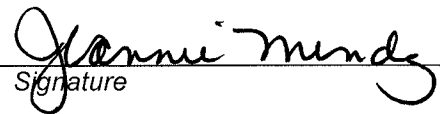
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 21, 2017

JEANNIE MENDEZ

Date

Printed Name

  
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**ADDITIONAL SERVICE INFORMATION (if needed):**

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) [con't]:**

Shiva D Beck	sbeck@gardere.com, jcharrison@gardere.com
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S Margaux Ross	margaux.ross@usdoj.gov
United States Trustee (SV)	ustpreion16.wh.ecf@usdoj.gov
Sharon Z. Weiss	sharon.weiss@bryancave.com, raul.morales@bryancave.com

**ADDITIONAL SERVICE INFORMATION (if needed):  
VIA U.S. MAIL**

<u>CREDITORS COMMITTEE:</u>	<u>EQUITY HOLDERS:</u>
Resources Global Professionals Attn: Brent Waters 17101 Armstrong Avenue Irvine, CA 92614  Winspeed Sports (Shanghai) Co., Ltd. c/o Brian Mitteldorf / Sam Mitteldorf Creditors Adjustment Bureau 14226 Ventura Blvd. Sherman Oaks, CA 91423  PT Sport Glove Indonesia Attn: Mark Robba Krandon Desa Pandowoharjo Sleman Yogyakarta 55512 Indonesia	Patrick W. O'Brien 301 Whitmore Lane Lake Forest, IL 60045-4707  Ronald Chez 1524 N. Astor Street Chicago, IL 60610  Scott Jarus 938 Duncan Avenue Manhattan Beach, CA 90266

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.